TSD File Inventory Index

Date August 4 2005

Initial CM Kenneth

Facility Name Exelon Generation Company LLC (Dresden Nuclear Power Station)

Facility Identification Number ILD 000 605 489 (Two Federal Site)

A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		1 Correspondence	
1 Correspondence		2 All Other Permitting Documents (Not Part of the ARA)	
2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)	
3 Part A Application and Amendments	X	C.2 Compliance/Enforcement	X
4 Financial Insurance (Sudden, Non Sudden)		1 Land Disposal Restriction Notifications	
5 Change Under Interim Status Requests		2 Import/Export Notifications	
6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
1 Correspondence		1 RFA Correspondence	
2 Reports		2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		3 State Prelim Investigation Memos	
1 Correspondence		4 RFA Reports	
2 Closure/Post Closure Plans Certificates etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		1 RFI Correspondence	
1 Correspondence		2 RFI Workplan	
2 Reports		3 RFI Program Reports and Oversight	
B 1 Administrative Record		4 RFI Draft /Final Report	

Total 2

5 RFI QAPP		7 Lab data Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data. Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
8 RFI Progress Reports		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		1 Forms/Checklists	
1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		1 Correspondence	
.3 CMS Workplan		.2 Reports	
4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
7 Lab Data. Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
1 CMI Correspondence		4 Ecological - Administrative Record	
2 CMI Workplan		5 Permitting	
3 CMI Program Reports and Oversight		6 Corrective Action Remediation Study	
4 CMI Draft/Final Reports		7 Corrective Action/Remediation Implementation	
5 CMI QAPP		8 Endangered Species Act	
6 CMI Correspondence		9 Environmental Justice	

Note Transmittal Letter to Be Included with Reports

Comments Documents do not qualify individual folder per schedule - C.3
Confidential documents to be in separate folder

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 12/31/02
GSA No. 0246-EPA-OT

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the *Resource Conservation and Recovery Act*).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

Date Received (For Official Use Only)

RECEIVED
DEC 28 2000

C
Exelon Gen. Co.
06306050019

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. Initial Notification [X] B. Subsequent Notification *(Complete item C)*

C. Installation's EPA ID Number: ILD000666489

II. Name of Installation *(Include company and specific site name)*

DRESDEN STATION

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 6500 N DRESDEN ROAD

Street *(Continued)*:

City or Town: MORRIS | State: IL | Zip Code: 60450-9765

County Code: 063 | County Name: GRUNDY

RECEIVED
JAN 17 2001
RECORDS ROOM
Waste, Pesticides & Toxics Division

IV. Installation Mailing Address *(See instructions)*

Street or P.O. Box: 6500 N DRESDEN ROAD

City or Town: MORRIS | State: IL | Zip Code: 60450-9765

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(Last)*: BOYLE | *(First)*: PATRICK

Job Title: CHEMISTRY MGR | Phone Number *(Area Code and Number)*: 815-942-2920

C

VI. Installation Contact Address *(See instructions)*

A. Contact Address Location [ ] Mailing [X]

B. Street or P.O. Box:

RECEIVED
DEC 19 2000

City or Town: | State: | Zip Code: -

C

VII. Ownership *(See instructions)*

A. Name of Installation's Legal Owner: EXELON GENERATION COMPANY LLC

Street, P.O. Box, or Route Number: 1400 OPUS PLACE SUITE 900

City or Town: DOWNERS GROVE | State: IL | Zip Code: 60515-5701

Phone Number *(Area Code and Number)*	B. Land Type	C. Owner Type	D. Change of Owner Indicator	Date Changed Month Day Year
630-663-5128	P	P	Yes [X] No [ ]	01 01 2001

1/12/01 ak

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 12/31/02
GSA No. 0246-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to Instructions)*

A. Hazardous Waste Activities

1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs)

2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes

Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ *5. Other - specify*

☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.

4. Exempt Boiler and/or Industrial Furnace
- ☐ a. Smelting, Melting, and Refining Furnace Exemption
- ☐ b. Small Quantity On-Site Burner Exemption

☐ 5. Underground Injection Control

B. Universal Waste Activity

☐ Large Quantity Handler of Universal Waste

C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
- ☐ a. Transporter
- ☐ b. Transfer Facility

2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Processor
- ☐ b. Re-refiner

☐ 3. Off-Specification Used Oil Burner

4. Used Oil Fuel Marketer
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

IX. Description of Hazardous Wastes *(Use additional sheets if necessary)*

A. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
F001	F002	F003	F004	F005	
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic
X	X	X	X

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1	2	3	4
D005	D006	D007	D008

C. Other Wastes. *(State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accord ance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inqui ry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the informati on submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant pena lties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
R.M. Krich	R.M. KRICH DIRECTOR-LICENSING	12/10/00

XI. Comments

ILD 000 665 489

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section IV of the booklet for addresses.)*

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 12/31/02
GSA No. 0246-EPA-OT

ID - For Official Use Only

ILD 000 665 489

IX. Description of Hazardous Wastes *(Continued; Additional Sheet)*

A. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; Use this page only if you need to list more than 12 waste codes.)*

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30
31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48
49	50	51	52	53	54
55	56	57	58	59	60
61	62	63	64	65	66
67	68	69	70	71	72
73	74	75	76	77	78
79	80	81	82	83	84
85	86	87	88	89	90
91	92	93	94	95	96

B. Toxicity Characteristic Hazardous Wastes. *(See 40 CFR 261.24; Use this page only if you need to list more than 4 waste codes.)*

5	6	7	8	9	10
D009	D010	D018	D027	D029	D030
11	12	13	14	15	16
D032	D033	D034	D035	D036	D039
17	18	19	20	21	22
D040	D042				

RCRA RECEIVED
Waste, Pesticides & Toxics Div.
U.S. EPA - REGION 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

June 11, 1997

COMMONWEALTH EDISON COMPANY
ATTN: BRIAN M. McCANN
ONE FIRST NATIONAL PLAZA
P.O. BOX 767
CHICAGO, IL 60690-0767

RE: US EPA ID Number **ILD 000 665 489**

Location: **6500 N DRESDEN RD**
MORRIS, ILLINOIS 60450-9765

In response to your correspondence of **06/26/96**, the following information has been updated:

LOCATION OF INSTALLATION: **6500 N DRESDEN RD**
MORRIS, ILLINOIS 60450

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (40% Postconsumer)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 28 1982

FILE COPY

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

HEMMINGER THOS DIR WATER QUAL
COMMONWEALTH EDISON CO DRESDEN GEN*
PO BOX 767 ROOM 1700E
CHICAGO IL 60690
FACILITY: LORENZO RD W OF RTE 1-*
LOCATION: MORRIS IL 60450
ID NO.: ILD000665489

RE: TSD Notification without Part A Application

Dear Notifier:

The United States Environmental Protection Agency (U.S. EPA) has received your notification of hazardous waste activity. On that form, by checking the "treat/store/dispose" (TSD) box, you indicated that you are a hazardous waste management facility (HWMF). To date, however, we have no record of having received Part A application for a hazardous waste permit which is required for all HWMFs.

Federal regulations require owners and operators of existing HWMFs (installations which treat, store, or dispose of hazardous waste) to have submitted a Part A permit application to the Regional Administrator by November 19, 1980, in accordance with 40 CFR 122.22. This requirement applied to HWMFs which were in existence on or before November 19, 1980. New facilities (those established after November 19, 1980) are required to submit Part A and Part B of their permit application, and receive a Resource Conservation and Recovery Act (RCRA) permit before beginning physical construction.

If your facility treats, stores, or disposes of hazardous waste, then your facility is operating without a hazardous waste permit, in violation of Section 3005 of RCRA, as amended. This violation is considered serious by the U.S. EPA, and may subject you to Federal enforcement under Section 3008 of RCRA for past and continued non-compliance.

Please submit your completed Part A application to the address below within fifteen days of receipt of this letter:

RCRA ACTIVITIES
P. O. Box A3587
Chicago, Illinois 60690-3587

We are aware that some hazardous waste handlers may have marked the TSD box on the notification form as a precaution or as a result of misunderstanding the May 19, 1980, hazardous waste regulations. If you notified us as a TSD in error, or if your status as a treatment, storage, or disposal facility has changed, please advise us in writing immediately.

Please contact Arthur Kawatachi of my staff at (312) 353-2197, if you have any questions regarding this letter.

Sincerely yours,

William H Miner for

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 9-30-96
GSA No. 0246-EPA-OT

Please refer to the *Instructions for Filling Notification* before completing this form. The information requested here is required by law (Section 3010 of the *Resource Conservation and Recovery Act*).

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)
3/8/00

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

☐ A. First Notification ☒ B. Subsequent Notification *(Complete item C)*

C. Installation's EPA ID Number: ILD000665489

II. Name of Installation *(Include company and specific site name)*
Dresden Nuclear Power Station

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street
6500 N Dresden Road

Street *(Continued)*

City or Town: Morris | State: IL | Zip Code: 60450-

County Code: 063 | County Name: Will

IV. Installation Mailing Address *(See Instructions)*

Street or P.O. Box
19156 S 85th Place

City or Town: Mokena | State: IL | Zip Code: 60448-

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(Last)*: Connelly | *(First)*: Thomas

Job Title: Manager | Phone Number *(Area Code and Number)*: 815-469-7007

VI. Installation Contact Address *(See Instructions)*

A. Contract Address Location ☐ Mailing ☐ Other ☐ | B. Street or P.O. Box

City or Town | State | Zip Code

VII. Ownership *(See Instructions)*

A. Name of installation's Legal Owner
ComEd

Street, P.O. Box, of Route Number
6500 N Dresden Road

City or Town: Morris | State: IL | Zip Code: 60450-

Phone Number *(Area Code and Number)*: 815-942-2920 | B. Land Type: P | C. Owner Type: P | D. Change of Owner Indicator: Yes ☒ No ☐ | (Date Changed) Month Day Year

MAR 08 2000
IEPA-DLPC

RECEIVED
APR 27 2000
[illegible]

EPA Form 8700-12 (Rev. 11-30-93) Previous edition is obsolete.

Continued on Reverse

4/3/00

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 9-30-96
GSA No. 0246-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes; Refer to Instructions)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
- [ ] a. Greater than 1000kg/mo (2,200 lbs.)
- [ ] b. 100 to 1000 kg/mo (200-2,200 lbs.)
- [X] c. Less than 100 kg/mo (220 lbs)

2. Transporter (Indicate Mode in boxes 1-5 below)
- [X] a. For own waste only
- [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [X] 3. Highway
- [ ] 4. Water
- [ ] 5. Other - specify

- [ ] 3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity; see Instructions.
4. Hazardous Waste Fuel
- [ ] a. Generator Marketing to Burner
- [ ] b. Other Marketers
- [ ] c. Boiler and/or Industrial Furnace
  - [ ] 1. Smelter Deferral
  - [ ] 2. Small Quantity Exemption

Indicate Type of Combustion Device(s)
- [ ] 1. Utility Boiler
- [ ] 2. Industrial Boiler
- [ ] 3. Industrial Furnace

- [ ] 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
- [ ] a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
- [ ] a. Utility Boiler
- [ ] b. Industrial Boiler
- [ ] c. Industrial Furnace

3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
- [ ] a. Transporter
- [ ] b. Transfer Facility

4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- [ ] a. Process
- [ ] b. Re-refine

IX. Description of Hazardous Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
X				D008

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1		3	4	5	6
7	8	9	10	11	12

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
Nancy D Weyh	Nancy Weyh - Mgr	3-6-00

XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

Commonwealth Edison Company
125 South Clark Str
P.O. Box 767
Chicago, IL 60690-0767

RECEIVED
AUG 11 1997
IEPA-DOL
PERMIT SECTION

ComEd

August 5, 1997

Mr. Jerry Kuhn
Illinois Environmental Protection Agency
Bureau of Land, Division of Land Pollution Control
Permits Section
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Subject: Copy of RCRA Facility Plan for ComEd's Quad Cities Station and Revised Permit Applications for ComEd Mixed Waste Facilities

Reference: Illinois EPA Log No. A-425

Dear Mr. Kuhn:

As requested, Commonwealth Edison (ComEd) is submitting a copy of the RCRA Facility Plan for Quad Cities Station for the Agency's records. Also enclosed are revised permit applications for all six ComEd mixed waste storage facilities.

Please note that the application for Zion Station (IEPA Log No. A-426) contains additional waste codes. The original waste code F001 was assigned using process knowledge of the waste in storage. Subsequent laboratory analysis has determined that additional waste codes apply to this same waste.

If you have any questions or comments regarding this submittal, please call me at (312) 394-4453.

Sincerely,

Grayce Majewski

Grayce Majewski
Principal Environmental Engineer
Environmental Services Department

Approval: Brian McCann

GLM:bg\31-qperm.doc

A503

cc: Illeywood
IIS

Form Approved, OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

For EPA Regional Use Only

Date Received
Month Day Year

EPA
United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the Instructions before starting)

RECEIVED
AUG 11 1997
IEPA-BOL
PERMIT SECTION

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. First Part A Submission

[X] B. Part A Amendment # Log # A-423

C. Installation's EPA ID Number: I L D 0 0 0 6 6 5 4 8 9

D. Secondary ID Number *(If applicable)*:

II. Name of Facility

COMED DRESDEN STATION

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street: 6500 N DRESDEN ROAD

Street *(Continued)*:

City or Town: MORRIS | State: IL | Zip Code: 60450-9765

County Code *(If known)*: | County Name: GRUNDY

B. Land Type (Enter code): P

C. Geographic Location
LATITUDE *(Degrees, Minutes, & Seconds)*: 41 24 000
LONGITUDE *(Degrees, Minutes & Seconds)*: 088 18 000

D. Facility Existence Date ** — Month: 07 Day: 06 Year: 1987

IV. Facility Mailing Address

Street or P.O. Box: PO BOX 767 ROOM 35FNW

City or Town: CHICAGO | State: IL | Zip Code: 60690-0767

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(Last)*: O'TOOLE | *(First)*: MARY F

Job Title: ENV. MANAGER | Phone Number *(Area Code and Number)*: 312-394-4430

VI. Facility Contact Address *(See instructions)*

A. Contact Address — Location [ ] Mailing [X] Other [ ]

B. Street or P.O. Box:

City or Town: | State: | Zip Code:

** NOTE: For the existing facility, mixed waste has been controlled at this facility since July 6, 1987. However, mixed waste was not regulated until IEPA received authority on May 1, 1990, effective November 1, 1990.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

EPA I.D. Number *(Enter from page 1)*: ILD000665489

Secondary ID Number *(Enter from page 1)*:

VII. Operator Information *(See instructions)*

Name of Operator: COMMONWEALTH EDISON COMPANY

Street or P.O. Box: PO BOX 767 ROOM 35FNW

City or Town: CHICAGO

State: IL

ZIP Code: 60690-0767

Phone Number *(Area Code and Number)*: 312-394-4430

B. Operator Type: P

C. Change of Operator Indicator: Yes [ ] No [X]

Date Changed Month Day Year:

VIII. Facility Owner *(See Instructions)*

A. Name of Facility's Legal Owner: COMMONWEALTH EDISON COMPANY

Street or P.O. Box: PO BOX 767 ROOM 35FNW

City or Town: CHICAGO

State: IL

ZIP Code: 60690-0767

Phone Number *(Area Code and Number)*: 312-394-4430

B. Owner Type: P

C. Change of Owner Indicator: Yes [ ] No [X]

Date Changed Month Day Year:

IX. SIC Codes *(4-digit, in order of significance)*

Primary	Secondary
4911 (Description) ELECTRIC SERVICES	(Description)
Secondary	**Secondary**
(Description)	(Description)

X. Other Environmental Permits *(See Instructions)*

A. Permit Type (Enter code)	B. Permit Number	C. Description
N	IL0000222 4	NPDES Permit
E	7302078 3	General Air Permit
R	LOG NO A-423	RCRA Part A Permit

EPA I.D. Number *(Enter from page 1)*

I	L	D	0	0	0	6	6	5	4	8	9

Secondary ID Number *(Enter from page 1)*

XI. Nature of Business *(Provide a brief description)*

Generation of electricity using nuclear fuel.

XII. Process Codes and Design Capacities

A. **PROCESS CODE** - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.*

B. **PROCESS DESIGN CAPACITY** - *For each code entered in column A, enter the capacity of the process.*
1. **AMOUNT** - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.*
2. **UNIT OF MEASURE** - *For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.*

C. **PROCESS TOTAL NUMBER OF UNITS** - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet or Hectare-meter
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day r Liters Per Day
D83	Surface Impoundment	Gallons or Liters
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage:	
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters
S02	Tank	Gallons or Liters
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons or Liters
S05	Drip Pad	Gallons or Liters
S06	Containment Building-Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment:	
T01	Tank	Gallons Per Day or Liters Per Day
T02	Surface Impoundment	Gallons Per Day or Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T80	Boiler	Gallons or Liters
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T88	Titanium Dioxide Chloride Process Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
T94	Containment Building-Treatment	Cubic Yards or Cubic Meters
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
X04	Geologic Repository	Cubic Yards or Cubic Meters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu's Per Hour	I

EPA I.D. Number *(Enter from page 1)*: I L D 0 0 0 6 6 5 4 8 9

Secondary ID Number *(Enter from page 1)*:

XII. Process Codes and Design Capabilities *(Continued)*

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	For Official Use Only
X 1	S 0 2	5 3 3 7 8 8	G	0 0 1	
1	S 0 1	7 0 0 0 0 0	G	0 0 2	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes *(Follow instructions from item XII for D99, S99, T04 and X99 process codes)*

Line Number (Enter #s in seq w/XII)	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	D. Description Of Processes
X 1	T 0 4				In-situ Vitrification
1					
2					
3					
4					

EPA I.D. Number *(Enter from page 1)*												Secondary ID Number *(Enter from page 1)*													
I	L	D	0	0	0	6	6	5	4	8	9														

XIV. Description of Hazardous Wastes

A. **EPA HAZARDOUS WASTE NUMBER** - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. **ESTIMATED ANNUAL QUANTITY** - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C **UNIT OF MEASURE** - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. **PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of item XIV-D(1).*
3. *Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).*

2. **PROCESS DESCRIPTION:** *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS (1) PROCESS CODES (Enter code)	D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included With Above

EPA I.D. Number *(Enter from page 1)*: I L D 0 0 0 6 6 5 4 8 9

Secondary ID Number *(Enter from page 1)*:

XIV. Description of Hazardous Wastes *(Continued)*

Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F002	7,500	P	S01	
2	F001	1,800	P	S01	
3	D008	8,200	P	S01	D004 through D043, F001, F002, F003, F004, F005
4	D001	12,000	P	S01	D004 through D043, F001, F002, F003, F004, F005
5	D002	3,000			
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					

EPA I.D. Number *(Enter from page 1)*	Secondary ID Number *(Enter from page 1)*
I L D 0 0 0 6 6 5 4 8 9	

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature	Date Signed
Louis O. DelGeorge, Vice President	8-6-97
Name and Official Title (Type or print)	
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
Name and Official Title (Type or print)	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

A 490

Commonwealth Edison Company
125 South Clark Street
P.O. Box 767
Chicago, IL 60690-0767

cc: Maywood
USEPA

Bill JHK JR

March 13, 1997

ComEd

CERTIFIED MAIL

Mr. Jerry Kuhn
Illinois Environmental Protection Agency
Bureau of Land, Division of Land Pollution Control
Permits Section
2200 Churchill Road
Springfield, Illinois 62794-9276

RECEIVED
MAR 25 1997
IEPA/DLPC
PERMIT SECTION

Subject: Additional Information Regarding the RCRA Interim Status Permit Modification for ComEd's Dresden Station (ILD000665489)

Reference: Illinois EPA Log No. A-490

Dear Mr. Kuhn:

As requested, Commonwealth Edison Company (ComEd) is providing the following additional information on incompatible waste management in regards to the RCRA Interim Status Permit modification for Dresden Station.

As you know, we have requested the addition of several waste codes to our existing permit to make it more generic and complete in the event an odd wastestream is generated in the future.

Currently, Dresden Station has 52 confirmed mixed waste drums in storage. These include the following wastestreams: freon filters and solvents from past dry cleaning operations (discontinued), oil and solvent mixtures, mineral spirits, solvents, paint wastes and boiler ash. Drums of like wastes are stored on containment pallets to mitigate any leaks and to provide a degree of separation for potentially incompatible wastes.

In addition, Dresden Station has specific procedures in place governing the management of incompatible wastes onsite as part of the RCRA Contingency Plan. The section on managing incompatible wastes states:

> *J. Special Requirements for Incompatible Wastes*
>
> *The purpose of this section is to provide guidance to prevent fires, explosions, gaseous emissions, leaching or other discharge of hazardous or mixed waste, or hazardous or mixed waste constituents which could result from the mixing of incompatible wastes or materials if containers break or leak.*
>
> *Incompatible wastes or incompatible wastes and materials are not to be placed in the same container. Only waste organic solvents are put into waste solvent containers.*

Wastes which are lab-packed are segregated by a contracted waste disposal contractor or Commonwealth Edison individual who are knowledgeable in the applicable EPA and DOT regulations, as well as applicable chemical requirements.

All wastes are placed in new, clean containers or in drums which previously held that exact waste material (Section 725.277).

Storage containers holding hazardous or mixed wastes that are incompatible with any waste or other materials stored in other containers, piles, open tanks or surface impoundments are separated from other materials (Section 725.177), or protected from them using a berm, dike or containment pallet as required by 35 IAC 725.277. Appendix 2 gives examples of potentially incompatible wastes and materials which should be segregated. Additionally, applicable disposal site requirements which are more stringent than those detailed in Appendix 2 must be adhered to. Contact Environmental Services for labeling, disposal site analysis, and packaging requirements.

For your information, we have also attached a schematic drawing of the mixed waste storage area delineating the locations of currently stored drums.

If you have any additional questions regarding this permit modification, please contact Grayce Majewski of my staff at (312) 394-4453.

Sincerely,

Diane H. Richardson for

Brian M. McCann
Supervisor of Land Quality
Environmental Services Department

GLM:BMM:bg/18-dperm.doc

10/30/96 REVISION

MIXED WASTE STORAGE AREA

NORTH ^

AISLE	ROW O	ROW N	AISLE	ROW M	ROW L	AISLE	ROW K	ROW J	AISLE	ROW I	ROW H	AISLE	ROW G	ROW F	AISLE	ROW E	ROW D	AISLE	ROW C	ROW B	AISLE	ROW A	AISLE
1	DR96-010	DR96-003	1			1	DR96-052	DR96-047	1	DR96-015	DR96-024	1	DR96-012	DR96-017	1			1					
2	DR96-009	DR96-008	2			2	DR96-054	DR96-051	2	DR96-027	DR96-028	2	DR96-013	DR96-020	2			2					
3	DR96-011	DR96-006	3	DR96-030	DR96-032	3	DR96-040	DR96-042	3	DR96-022	DR96-025	3	DR96-018	DR96-014	3			3					
4	DR96-004	DR96-005	4	DR96-029	DR96-031	4	DR96-046	DR96-050	4	DR96-023	X	4	DR96-019	DR96-021	4			4					
5	X	DR96-007	5	DR96-037	DR96-035	5	DR96-045	DR96-044	5			5	X	DR96-016	5			5	NON RADIOACTIVE AREA				
6	X	X	6	DR96-034	DR96-033	6	DR96-041	DR96-048	6			6	X	X	6			6					
7			7	DR96-038	DR96-036	7	DR96-053	DR96-026	7			7			7			7					
8			8	X	DR96-039	8	DR96-049	DR96-043	8			8			8			8					
9			9			9			9			9			9			9					
10			10			10			10			10			10			10					
11			11			11			11			11			11			11					
12			12			12			12			12			12			12					

S.O.P.

POTENTIAL MIXED WASTE / DRUM SCREENING STORAGE AREA

NON RADIOACTIVE AREA

= Containment Pallet (4 drums maximum)

X = Empty Space

Commonwealth Edison Company
One First National Pla.
P.O. Box 767
Chicago, IL 60690-0767

COM-ED DRESDEN Sta
IL 3060 5014
GRUNDY-CO

A 490

ComEd

June 26, 1996

RECEIVED
DEC 26 1996
PROGRAM MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA – REGION 5

Mr. Jerry Kuhn
Illinois Environmental Protection Agency
Bureau of Land, Division of Land Pollution Control
Permits Section
2200 Churchill Road
Springfield, Illinois 62794-9276

RECEIVED
JUL - 1 1996
IEPA-BOL
PERMIT SECTION

Subject: Modification to RCRA Interim Status Permit
ComEd Dresden Station (ILD 000 665 489)

Dear Mr. Kuhn:

As discussed with you on June 25th, Commonwealth Edison Company (ComEd) is requesting a modification to the RCRA Interim Status Permit for Dresden Station for storage of mixed hazardous-radioactive wastes.

Through aggressive waste minimization, we have virtually eliminated the generation of new mixed waste at ComEd's nuclear stations. We have also disposed of those mixed wastes for which there was viable disposal capacity, reducing the volumes stored at our facilities.

Mixed waste is now only sporadically generated, and it can be difficult to predict exactly what waste codes might result in any one given waste. For example at Dresden, a typical oil/solvent drum was generated. Analysis results indicate that the TCLP level for F003 is exceeded, though F003 is not currently included in the station's permitted waste codes. Since there continues to be very limited disposal capacity for mixed wastes, Dresden Station has had no option but to store this waste on-site.

In order to preclude having to submit a permit modification every time an odd waste code does appear, ComEd is proposing to modify Dresden's existing permit to include additional waste codes, such that the permit is more "generic." (When originally submitted in 1990, the Part A permit reflected only those waste codes that were then in storage at Dresden Station. The permit was subsequently modified in 1992 to include additional waste codes.)

As requested, attached please find a copy of Dresden Station's existing Part A storage permit, as well as a new application incorporating the proposed addition of waste codes.

In addition, please be advised that since applying for the USEPA and IEPA identification numbers, Dresden Station's street address has been changed to the following:

ComEd - Dresden Station
6500 N. Dresden Road
Morris, Illinois 60450-9765

We appreciate your assistance in this matter. If you have any questions, please contact Grayce Majewski of my staff at (312) 394-4453.

Sincerely,

Brian M McCann

Brian M. McCann
Supervisor of Land Quality
Environmental Services Department

Attachment

GLM:BMM:bg
24-dnps.doc

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD000665489 REACKNOWLEDGEMENT

COMMONWEALTH EDISON CO DRESDEN GEN STA
PO BOX 767 ROOM 1700E
CHICAGO IL 60690

INSTALLATION ADDRESS ➤

LORENZO RD W OF RTE I-55
MORRIS IL 60450

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

001104 AUG 25 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD000665489 T/A 2 C 1	A	80 08 18

Commonwealth Edison Co.
Dresden Generating Station

I. NAME OF INSTALLATION

DRESDEN GENERATING STATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 PO BOX 767, ROOM 1700E

CITY OR TOWN	ST.	ZIP CODE
4 CHICAGO	IL	60690

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 LORENZO RD W OF RTE I-55

CITY OR TOWN	ST.	ZIP CODE
6 MORRIS	IL	60450

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
2 HEMMINGER THOMAS	312-294-4433

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 COMMONWEALTH EDISON COMPANY

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON–FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD000665489

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 20 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W	I	L	D	0	0	0	6	6	5	4	8	9	2	1
1	2										13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F002				
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☒ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
J. W. Johnson	J. W. Johnson Vice President	8/14/80

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL — EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F I L D 0 0 0 6 6 5 4 8 9 D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP COMMONWEALTH EDISON DRESDEN STATION

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 T. E. HEMMINGER	312 294 4433

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 PO BOX 767

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 CHICAGO	IL	60690

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 LORENZO RD. 4 MI W. I-55

B. COUNTY NAME

GRUNDY

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 MORRIS	IL	60450	

EPA Form 3510-1 (6-80)

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
4911 (specify) Electric Power Generation	(specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME

COMMONWEALTH EDISON COMPANY

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE

(specify)

D. PHONE (area code & no.)

A 312 294 4433

E. STREET OR P.O. BOX

P. O. BOX 767

F. CITY OR TOWN

B CHICAGO

G. STATE

IL

H. ZIP CODE

60690

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N IL0002224	9 P NA

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)	
9 U NA	9 7302083	(specify) Air Operating Permit

C. RCRA (Hazardous Wastes)	E. OTHER (specify)	
9 R NA	9 NA	(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Generation of Electricity Using Nuclear Fuel

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
T.E. Hemminger Environmental Services Manager	Thomas E Hemminger	July 1, 199

COMMENTS FOR OFFICIAL USE ONLY

C

Inited States
Environmental Protection
Agency

Office of W[illegible]d
Hazardous Wa[illegible]e
Washington, DC 20460

EPA Form 3510-3
June 1980

Solid Waste

EPA

Application Form 3 - Hazardous Waste Information

Consolidated Permits Program

This form must be completed by all persons applying for an EPA hazardous waste permit.

FORM 3 – GENERAL INFORMATION

This form must be completed by all applicants who check "yes" to Item II–E in Form 1.

Permit Application Process

There are two parts to a RCRA permit application – Part A and Part B. Part A consists of this form and Form 1 of the Consolidated Permit Application. Part B requires detailed site–specific information such as geologic, hydrologic, and engineering data. 40 CFR 122.25 specifies the information that will be required from hazardous waste management facilities in Part B.

RCRA established a procedure for obtaining "interim status" which allows existing hazardous waste management facilities to continue their operations until a final hazardous waste permit is issued. In order to qualify for interim status, existing hazardous waste management facilities must submit Part A of the permit application to EPA within six months after the promulgation of regulations under Section 3001 of RCRA *(40 CFR Part 261)*. In order to receive a hazardous waste permit, existing facilities must submit a complete Part B within six months after it is requested by EPA. New facilities must submit both Part A and Part B to EPA at least 180 days before physical construction is expected to commence.

Operation During Interim Status

As provided in 40 CFR 122.23(b), Part A of the permit application defines the processes to be used for treatment, storage, and disposal of hazardous wastes; the design capacity of such processes; and the specific hazardous wastes to be handled at a facility during the interim status period. Once Part A is submitted to EPA, changes in the hazardous wastes handled, changes in design capacities, changes in processes, and changes in ownership or operational control at a facility during the interim status period may only be made in accordance with the procedures in 40 CFR 122.23(c). Changes in design capacity and changes in processes require prior EPA approval. Changes in the quantity of waste handled at a facility during interim status can be made without submitting a revised Part A provided the quantity does not exceed the design capacities of the processes specified in Part A of the permit application. Failure to furnish all information required to process a permit application is grounds for termination of interim status.

Confidential Information

All information submitted in this form will be subject to public disclosure, to the extent provided by RCRA and the Freedom of Information Act, 5 U.S.C. Section 552, and EPA's Business Confidentiality Regulations, 40 CFR Part 2 *(see especially 40 CFR 2.305)*. Persons filing this form may make claims of confidentiality. Such claims must be clearly indicated by marking "confidential" on the specific information on the form for which confidential treatment is requested or on any attachments, and must be accompanied, at the time of filing, by a written substantiation of the claim, by answering the following questions:

Confidential Information *(continued)*

A. Which portions of the information do you claim are entitled to confidential treatment?

B. For how long is confidential treatment desired for this information?

C. What measures have you taken to guard against undesired disclosure of the information to others?

D. To what extent has the information been disclosed to others, and what precautions have been taken in connection with that disclosure?

E. Has EPA or any other Federal agency made a pertinent confidentiality determination? If so, include a copy of such determination or reference to it, if available.

F. Will disclosure of the information be likely to result in substantial harmful effects on your competitive position? If so, what would those harmful effects be and why should they be viewed as substantial? Explain the causal relationship between disclosure and the harmful effects.

Information covered by a confidentiality claim and the above substantiation will be disclosed by EPA only to the extent and by means of the procedures set forth in 40 CFR Part 2.

If no claim of confidentiality or no substantiation accompanies the information when it is submitted, EPA may make the information available to the public without further notice to the submitter.

Definitions

Terms used in these instructions and in this form are defined in the Glossary section of the instructions to Form 1. For additional definitions and procedures to use in applying for a permit for a hazardous waste management facility, refer to the regulations promulgated under Section 3005 of RCRA and published in 40 CFR Parts 122 and 124.

FORM 3 LINE–BY–LINE INSTRUCTIONS

Completing This Form

Please type or print in the unshaded areas only. Some items have small graduation marks or boxes in the fill–in spaces. These marks indicate the number of characters that may be entered into our data system. The marks are spaced at 1/6" intervals which accommodate elite type *(12 characters per inch – one space between letters)*. If you do not have a typewriter with elite type then please print, placing each character between the marks. Abbreviate if necessary to stay within the number of characters allowed for each item. Use one space for breaks between words, but not for punctuation marks unless the space is needed to clarify your information.

Item I

Existing hazardous waste management facilities should enter their EPA Identification Number *(if known)*. New facilities should leave this item blank.

Item II

A. FIRST APPLICATION. If this is the first application that is being filed for the facility place an "X" in either the Existing Facility box or the New Facility box.

1. EXISTING FACILITY. Existing facilities are:

   a. Those facilities which received hazardous waste for treatment, storage, and/or disposal on or before October 21, 1976, or

   b. Those facilities for which construction had commenced on or before October 21, 1976. Construction had "commenced" only if:

      (1) The owner or operator had obtained all necessary Federal, State, and local preconstruction approvals or permits; and

Item II *(continued)*

(2-a) A continuous physical, on-site construction program had begun *(facility design or other preliminary non-physical and non-site specific preparatory activities do not constitute an on-site construction program)*, or

(2-b) The owner or operator had entered into contractual obligations *(options to purchase or contracts for feasibility, engineering, and design studies do not constitute contractual obligations)* which could not be cancelled or modified without substantial loss. Generally, a loss is deemed substantial if the amount an owner or operator must pay to cancel construction agreements or stop construction exceeds 10% of the total project cost.

(NOTE: This definition of "existing facility" reflects the literal language of the statute. However, EPA believes that amendments to RCRA now in conference will shortly be enacted and will change the date for determining when a facility is an "existing facility" to one no earlier than May of 1980; indications are the conferees are considering October 30, 1980. When those amendments are enacted, EPA will amend the definition of "existing facility."

Accordingly, EPA encourages every facility built or under construction on the promulgation date of the RCRA program regulations to notify EPA and file Part A of the permit application so that it can be quickly processed for interim status when the change in the law takes effect.)

EXISTING FACILITY DATE. If the Existing Facility box is marked, enter the date hazardous waste operations began *(i.e., the date the facility began treating, storing, or disposing of hazardous waste)* or the date construction commenced.

2. NEW FACILITY. New facilities are all facilities for which construction commenced, or will commence, after October 21, 1976.

NEW FACILITY DATE. If the New Facility box is marked, enter the date that operation began or is expected to begin.

8. REVISED APPLICATION. If this is a subsequent application that is being filed to amend data filed in a previous application, place an "X" in the appropriate box to indicate whether the facility has interim status or a permit.

1. FACILITY HAS INTERIM STATUS. Place an "X" in this box if this is a revised application to make changes at a facility during the interim status period.

2. FACILITY HAS A PERMIT. Place an "X" in this box if this is a revised application to make changes at a facility for which a permit has been issued.

(NOTE: When submitting a revised application, applicants must resubmit in their entirety each item on the application for which changes are requested. In addition, Items I and IX [and Item X if applicable] must be completed. It is not necessary to resubmit information for other items that will not change).

Item III

The information in Item III describes all the processes that will be used to treat, store, or dispose of hazardous waste at the facility. The design capacity of each process must be provided as part of the description. The design capacity of injection wells and landfills at existing facilities should be measured as the remaining, unused capacity. See the form for the detailed instructions to Item III.

Item IV

The information in Item IV describes all the hazardous wastes that will be treated, stored, or disposed at the facility. In addition, the processes that will be used to treat, store, or dispose of each waste and the estimated annual quantity of each waste must be provided. See the form for the detailed instructions to Item IV.

Item V

All existing facilities must include a drawing showing the general layout of the facility. This drawing should be approximately to scale and fit in the space provided on the form. This drawing should show the following:

The property boundaries of the facility;

The areas occupied by all storage, treatment, or disposal operations that will be used during interim status;

The name of each operation. *(Example – multiple hearth incinerator, drum storage area, etc.)*;

Areas of past storage, treatment, or disposal operations;

Areas of future storage, treatment, or disposal operations; and

The approximate dimensions of the property boundaries and all storage, treatment, and disposal areas.

See Figure 3–1 for an example of a facility drawing. New facilities do not have to complete this item.

Item VI

All existing facilities must include photographs that clearly delineate all existing structures; all existing areas for storing, treating, or disposing of hazardous waste; and all known sites of future storage, treatment, or disposal operations. Photographs may be color or black and white, ground-level or aerial. Indicate the date the photograph was taken on the back of each photograph.

Item VII

Enter the latitude and longitude of the facility in degrees, minutes, and seconds. For larger facilities, enter the latitude and longitude at the approximate mid-point of the facility. You may use the map you provided for Item XI of Form 1 to determine latitude and longitude. Latitude and longitude information is also available from Regional Offices of the U.S. Department of Interior, Geological Survey and from State Agencies, such as the Department of Natural Resources.

Item VIII

See the form for the instructions to Item VIII.

Item IX and Item X

All facility owners must sign Item IX. If the facility will be operated by someone other than the owner, then the operator must sign Item X. Federal regulations require the certification to be signed as follows:

A. For a corporation, by a principal executive officer at least the level of vice president;

B. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or

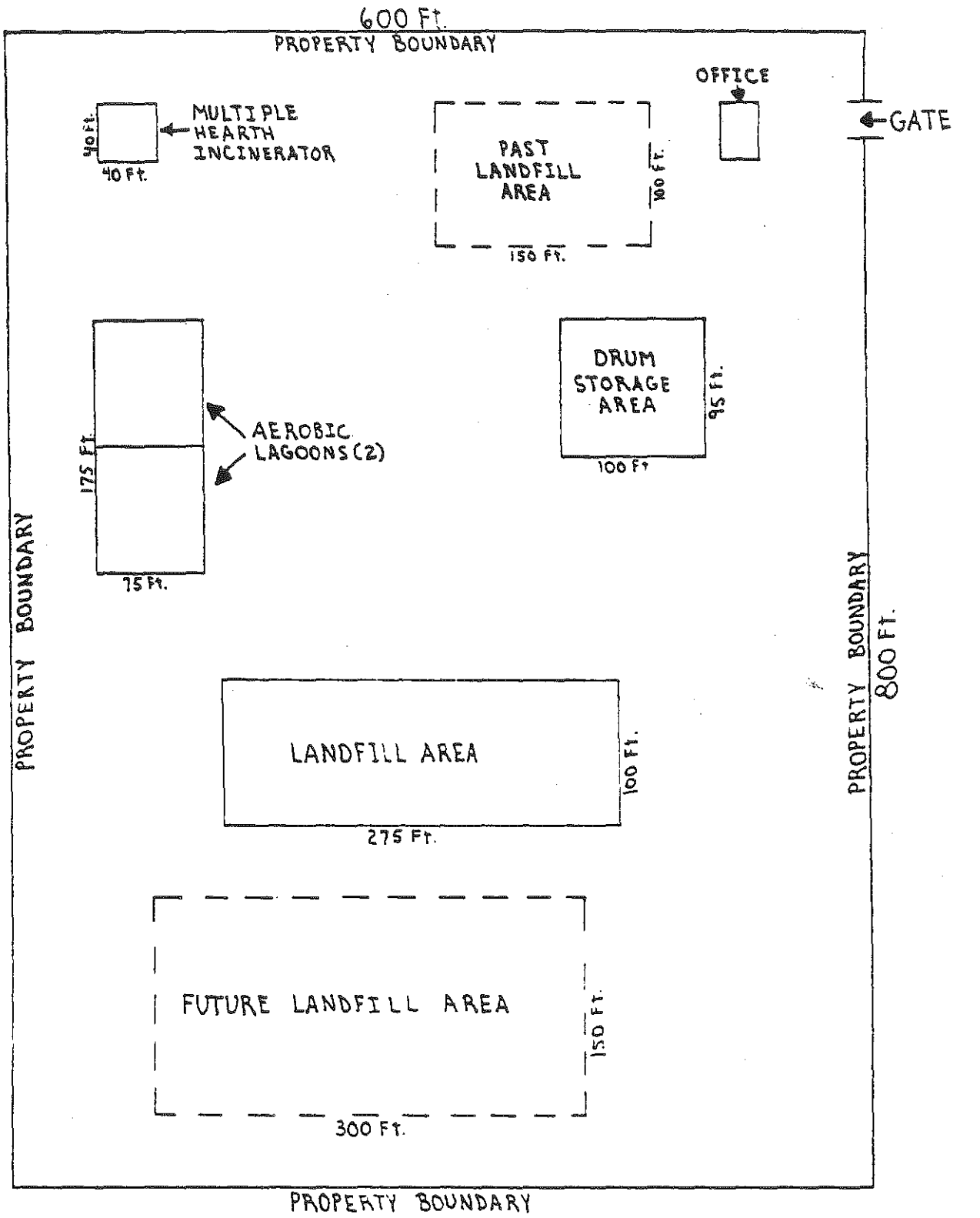
C. For a municipality, State, Federal, or other public facility, by either a principal executive officer or ranking elected official.

The Resource Conservation and Recovery Act provides for severe penalties for submitting false information on this application form.

Section 3008(d) of the Resource Conservation and Recovery Act provides that "Any person who knowingly makes any false statement or representation in any application, . . . shall, upon conviction be subject to a fine of not more than $25,000 for each day of violation, or to imprisonment not to exceed one year, or both."

V. FACILITY DRAWING *(see page 4)*

EXAMPLE



SCALE: 1 INCH = 100 FEET

FIGURE 3-1

Please print or type in the unshaded a[illegible]only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S30004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F I L D 0 0 0 6 6 5 4 8 9

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* ✱

☐ 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: C | 8 | 8 7 | 0 7 | 0 6 | (YR. | MO. | DAY)

FOR NEW FACILITIES PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN: (YR. | MO. | DAY)

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C | DUP | T/A | C | 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	7000	G	
2				
3				
4				

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1				
X-2				
1				
2				
3				
4				

✱ For the existing facility, mixed waste has been controlled at this facility since July 6, 1987. However, mixed waste was not regulated until the IEPA received authority on May 1, 1990, effective November 1, 1990.

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

N/A

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before con ng if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)														FOR OFFICIAL USE ONLY											
S	W	I	L	D	0	0	0	6	6	5	4	8	9	T/A	C	1	S	W	DUP	T/A	C	2	DUP		

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F002	7560	P	S01	
2	F001	1880	P	S01	
3	D008	480	P	S01	D039
4	D018	244	P	S01	
5	D001	5270	P	S01	
6	D001	2356	P	S01	D035
7	D001	480	P	S01	D039
8	D001	999	P	S01	D008
9	D001	480	P	S01	D008, D010, D035, D036
10	D001	480	P	S01	D036
11	D001	959	P	S01	D006, D008, D036, D039
12	D001	157	P	S01	D006, D029
13	D008	7508	P	S01	D004, D005, D006, D007, D010
14	D008	244	P	S01	D007, D035, D039, D018
15	D001	323	P	S01	D036, D039
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

N/A

EPA I.D. NO. *(enter from page 1)*

F | I | L | D | 0 | 0 | 0 | 6 | 6 | 5 | 4 | 8 | 9 | N/A | 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*. Attachment 3

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*. Attachment 4

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
41 24 00	88 18 00

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true; accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
T. E. Hemminger	Thomas E Hemminger	July 1, 1992

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
T. E. Hemminger	Thomas E Hemminger	July 1, 1992

United States
Environmental Protection
Agency

Office of Water and
Hazardous Waste
Washington, DC 204_

EPA Forms 3510-1 and 3510-3
June 1980

Solid Waste

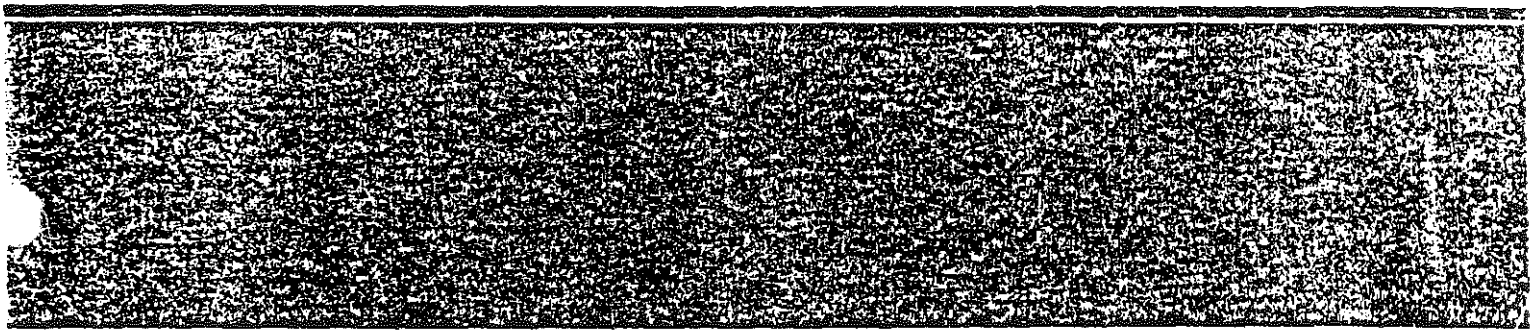
EPA

Application for a Hazardous Waste Permit

Consolidated Permits Program

This package contains Part A of the application for an EPA hazardous waste permit.

RECEIVED



Printed on Recycled Paper

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C 20460

JUNE 13, 1980

THE ADMINISTRATOR

Enclosed are the application forms and instructions for a Federal permit to treat, store, or dispose of hazardous waste.

The Resource Conservation and Recovery Act (RCRA) requires anyone who owns or operates a facility where hazardous waste is treated, stored, or disposed to have a permit. RCRA establishes a procedure for obtaining interim status which allows existing facilities to continue operating until a final hazardous waste permit is issued. In order to obtain interim status, existing facilities must complete a two step process. The first step is the submittal of a Notification of Hazardous Waste Activity form. Copies of this form were mailed in mid-June. You probably already have a form and are reminded that it must be submitted by August 18, 1980. If you need a form, please contact the EPA Regional Office which serves your area. The second step is to submit the permit application forms included in this package by November 19, 1980. If you do not file a notification form and complete the permit application on time, you will be required by law to halt your operations until a permit is issued.

EPA is identifying hazardous waste in several stages. The first set of hazardous waste was identified and listed in regulations published in the May 19, 1980 Federal Register. Applications covering these wastes are due by November 19, 1980. In June, EPA will publish an additional set of hazardous wastes; a list of these wastes was included in the May 19 Federal Register and in the instruction package for the Notification of Hazardous Waste Activity form. Applications covering these wastes are required in December. If you treat, store, or dispose of wastes included in this second set of hazardous wastes you are encouraged to include those hazardous wastes in the application which is due by November 19, in order to eliminate the need for filing two separate permit applications.

Copies of the EPA regulations which were published on May 19 may be obtained by contacting:

Mr. Ed Cox
Solid Waste Publications
26 W. St. Claire Street
Cincinnati, Ohio 45268
(513) 684-5362

There are two parts to a RCRA permit application - Part A and Part B. Part A consists of Form 1 and Form 3 of EPA's Consolidated Permit Application. These forms are contained in this package and must be submitted by November 19, 1980.

Part B of the RCRA permit application contains detailed, site-specific information. The Part B information requirements have not yet been fully developed. We expect to publish the full set of Part B information requirements next October or November. Part B of the permit application will not have to be submitted until it is requested by EPA. You will then have up to six months to submit that part of the application. Given the large number of existing treatment, storage, and disposal facilities, we expect it will take at least several years before all Part B's will be requested.

Owners and operators of existing hazardous waste treatment, storage, and disposal facilities who file both their notification and Part A of their permit application on time will be sent an acknowledgement that EPA has received these documents. The acknowledgement will include the facility's EPA Identification Number. This number must be used on shipping manifests for transporting hazardous waste, on Annual Reports, and on all other correspondence with EPA.

Because thousands of persons will be filing permit applications, it will take four to eight weeks for the Agency to issue acknowledgements. If you do not receive an acknowledgement within eight weeks after your application is submitted, you should contact the appropriate EPA Regional Permit Contact listed in the enclosed instruction sheets entitled "How To Apply for a RCRA Permit."

Several State governments have permit requirements similar to EPA's. Even if you have a State hazardous waste permit you must file a RCRA permit application with EPA if you own or operate a facility where hazardous waste is treated, stored, or disposed.

The enclosed instruction sheets show the specific steps on how to apply for a RCRA permit. If after reading the instructions you have any questions regarding the permit application process, please contact the EPA Regional Permit Contact in your area for assistance.

Sincerely yours,

Douglas M. Costle

Enclosures

Who Must File a RCRA Permit Application

The Resource Conservation and Recovery Act of 1976 *(RCRA)* requires each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste to have a permit. This includes individuals, trusts, firms, joint stock companies, corporations *(including government corporations)*, partnerships, associations, States, municipalities, commissions, interstate bodies and Federal Agencies. If you treat, store, or dispose of hazardous waste without obtaining a permit, you may be subject to civil or criminal penalty.

How to Determine if you Handle Hazardous Waste

OFF–SITE FACILITIES. Owners and operators of off–site treatment, storage, or disposal facilities are encouraged to obtain waste information from the generators they serve. If the generators will not supply this information, you are still responsible for determining if you handle a hazardous waste and should follow the procedures below for on–site facilities.

ON–SITE FACILITIES. Solid waste generators who treat, store, or dispose of their own waste on–site should follow the following procedures for determining if their waste is a hazardous waste. This determination is made as follows:

A. First, determine if the solid waste handled is excluded from regulation as a hazardous waste. The list of exclusions can be found in the regulation titled "Identification and Listing of Hazardous Waste", Sections 261.4 and 261.5 published in the "Federal Register," May 19, 1980. If the solid waste handled is excluded, a RCRA hazardous waste permit is not needed to treat, store, or dispose of these wastes.

B. If the solid waste handled is not excluded by Sections 261.4 or 261.5, determine if the waste is listed in Subpart D of "Identification and Listing of Hazardous Waste." Persons owning or operating facilities where listed hazardous waste is treated, stored, or disposed are subject to regulation and must file a RCRA permit application.

C. If the waste handled is not listed in Subpart D of "Identification and Listing of Hazardous Waste," the waste may still be hazardous because it possesses certain characteristics or contains certain contaminants. These characteristics and contaminants are contained in Subpart C of "Identification and Listing of Hazardous Waste." A determination that a waste possesses these characteristics or contaminants may be made either based on: (1) Your knowledge of the hazard characteristic of the waste in light of the materials or the processes used; or (2) The results of testing the waste according to the methods in Subpart C of "Identification and Listing of Hazardous Waste."

Certain persons who handle hazardous waste are not required to obtain a RCRA permit. They are:

Generators who accumulate their own hazardous waste on–site for less than 90 days as provided in 40 CFR 262.34;

Farmers who dispose of hazardous waste pesticide from their own use as provided in 40 CFR 262.51; and

Owners and operators of totally enclosed treatment facilities as defined in 40 CFR 260.10.

What Information Should be Filed and When

There are two parts to the RCRA permit application – Part A and Part B. Part A consists of Form 1 and Form 3 of EPA's Consolidated Permit Application. Part B requires detailed site–specific information such as geologic, hydrologic, and engineering data. 40 CFR 122.25 specifies the information that will be required from hazardous waste management facilities in Part B.

RCRA established a procedure for obtaining "interim status" which allows existing hazardous waste management facilities to continue their operations until a final hazardous waste permit is issued. In order to qualify for interim status, owners and operators of existing hazardous waste management facilities must complete and sign both Forms 1 and 3 and submit them to EPA by November 19, 1980. In order for an existing facility to receive a permit, a complete Part B must be submitted within six months after it is requested by EPA. For new facilities, both Part A and Part B must be submitted to EPA at least 180 days before physical construction is expected to commence.

Operation During Interim Status

As provided in 40 CFR 122.23(b), Part A of the permit application defines the processes to be used for treatment, storage, and disposal of hazardous wastes; the design capacity of such processes; and the specific hazardous wastes to be handled at a facility during the interim status period. Once Part A is submitted to EPA, changes in the hazardous wastes handled, changes in design of facilities, changes in processes, and changes in ownership or operational control at a facility during the interim status period may only be made in accordance with the procedures in 40 CFR 122.23(c). Changes in design capacity and changes in processes require prior EPA approval. Changes in the quantity of waste handled at a facility during interim status can be made without submitting a revised Part A provided the quantity does not exceed the design capacities of the processes specified in Part A of the permit application. Failure to furnish all information required to process a permit application is grounds for termination of interim status.

How Many Applications Should be Filed

You need submit only one RCRA permit application *(Part A and Part B)* per site or location, provided that you describe all of the activities at that site or location. If you conduct hazardous waste activity*(ies)* at more than one site or location, you must submit a separate application for each site or location.

Where to File

Permit applications should be sent to the EPA Regional office that serves the area where your hazardous waste management facility is located. If you previously received a notification packet from EPA that contains two preaddressed mailing labels and two envelopes, you should use one of the mailing labels and one of the envelopes to send your permit application to EPA. If you do not have a preaddressed mailing label, mail your permit application to the EPA Regional office that serves the area where your hazardous waste management facility is located. The mailing addresses for the EPA Regional offices are listed on the following page.

REGIONAL MAILING ADDRESSES AND PERMIT CONTACTS UP TO NOVEMBER 19, 1980

EPA REGION	AREA SERVED	PERMIT APPLICATION MAILING ADDRESSES[1]	EPA REGIONAL HAZARDOUS WASTE PERMIT CONTACTS[2]
I	Connecticut, Maine Massachusetts, Rhode Island, Vermont, New Hampshire	EPA Region I Permits Branch P.O. Box 8748 Boston, MA 02114	Rich Cavagnero (617) 223–0240
II	New Jersey, New York, Virgin Islands, Puerto Rico	EPA Region II Information Service Center 26 Federal Plaza New York, NY 10007	Harry Ruisi (212) 264–0503
III	Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia	EPA Region III P.O. Box 1480 Philadelphia, PA 19107	Shirley Bulkin (215) 597–8751
IV	Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee	EPA Region IV RCRA Activities 345 Courtland, N.E. [illegible]	Ray Cozart (404) 881–3446
V	Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin	[illegible]	[illegible] *, MI, MN,*
VI	Arkansas, Louisiana, New Mexico, Oklahoma, Texas	[illegible] 1201 Elm Street First International Bldg. Dallas, TX 75270	
VII	Iowa, Kansas, Missouri, Nebraska	EPA Region VII P.O. Box 15606 Kansas City, MO 64106	Dennis Degner (800) 892–3837 *(MO)* (800) 821–3714 *(IA, KS, NE)*
VIII	Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming	EPA Region VIII 8AH–WM (ON) 1860 Lincoln Street Denver, CO 80295	Jim Rakers (303) 837–2221 (800) 332–3321 *(CO)* (800) 525–3022 *(MT, ND, SD, UT, WY)*
IX	Arizona, California, Hawaii, Nevada, Guam, American Samoa, Commonwealth of the Northern Marianas	EPA Region IX Attn: A–3–2 215 Fremont Street San Francisco, CA 94105	Bill Wilson (415) 556–1407
X	Alaska, Idaho, Oregon, Washington	EPA Region X M/S 530–A 1200 Sixth Avenue Seattle, WA 98101	Betty Wiese (206) 442–1260 (800) 542–0841 *(WA)* (800) 426–0663 *(AL, ID, OR)*

[1] These mailing addresses should be used for all applications filed by November 19, 1980. After November 19, all applications should be mailed to the addresses listed in Table 1 in the instructions to Form 1 which are enclosed in this packet.

[2] These persons should be contacted if you need assistance in applying for a RCRA Hazardous Waste Permit up to November 19, 1980. After November 19, contact the persons listed in Table 1 in the instructions to Form 1 which are enclosed in this packet.

United States
Environmental Protection
Agency

Office of
Enforcement
Washington, DC 20460

EPA Form 3510-1
June 1980

Permits Division

EPA

Application Form 1 - General Information

Consolidated Permits Program

This form must be completed by all persons applying for a permit under EPA's Consolidated Permits Program. See the general instructions to Form 1 to determine which other application forms you will need.

DESCRIPTION OF CONSOLIDATED PERMIT APPLICATION FORMS

The Consolidated Permit Application Forms are:

Form 1 – General Information *(included in this part)*;

Form 2 – Discharges to Surface Water *(NPDES Permits)*:

2A. Publicly Owned Treatment Works *(Reserved – not included in this package)*,

2B. Concentrated Animal Feeding Operations and Aquatic Animal Production Facilities *(not included in this package)*,

2C. Existing Manufacturing, Commercial, Mining, and Silvicultural Operations *(not included in this package)*, and

2D. New Manufacturing, Commercial, Mining, and Silvicultural Operations *(Reserved – not included in this package)*;

Form 3 – Hazardous Waste Application Form *(RCRA Permits – included in Part 2 of this package)*;

Form 4 – Underground Injection of Fluids *(UIC Permits – Reserved – not included in this package)*; and

Form 5 – Air Emissions in Attainment Areas *(PSD Permits – Reserved – not included in this package)*.

FORM 1 PACKAGE TABLE OF CONTENTS

SECTION A – GENERAL INSTRUCTIONS

Who Must Apply

With the exceptions described in Section C of these instructions, Federal laws prohibit you from conducting any of the following activities without a permit.

NPDES *(National Pollutant Discharge Elimination System Under the Clean Water Act, 33 U.S.C. 1251)*. Discharge of pollutants into the waters of the United States.

RCRA *(Resource Conservation and Recovery Act, 42 U.S.C. 6901)*. Treatment, storage, or disposal of hazardous wastes.

UIC *(Underground Injection Control Under the Safe Drinking Water Act, 42 U.S.C. 300f)*. Injection of fluids underground by gravity flow or pumping.

PSD *(Prevention of Significant Deterioration Under the Clean Air Act, 72 U.S.C. 7401)*. Emission of an air pollutant by a new or modified facility in or near an area which has attained the National Ambient Air Quality Standards for that pollutant.

Each of the above permit programs is operated in any particular State by either the United States Environmental Protection Agency *(EPA)* or by an approved State agency. You must use this application form to apply for a permit for those programs administered by EPA. For those programs administered by approved States, contact the State environmental agency for the proper forms.

If you have any questions about whether you need a permit under any of the above programs, or if you need information as to whether a particular program is administered by EPA or a State agency, or if you need to obtain application forms, contact your EPA Regional office *(listed in Table 1)*.

Upon your request, and based upon information supplied by you, EPA will determine whether you are required to obtain a permit for a particular facility. Be sure to contact EPA if you have a question, because Federal laws provide that you may be heavily penalized if you do not apply for a permit when a permit is required.

Form 1 of the EPA consolidated application forms collects general information applying to all programs. You must fill out Form 1 regardless of which permit you are applying for. In addition, you must fill out one of the supplementary forms *(Forms 2 – 5)* for each permit needed under each of the above programs. Item II of Form 1 will guide you to the appropriate supplementary forms.

You should note that there are certain exclusions to the permit requirements listed above. The exclusions are described in detail in Section C of these instructions. If your activities are excluded from permit requirements then you do not need to complete and return any forms.

NOTE: Certain activities not listed above also are subject to EPA administered environmental permit requirements. These include permits for ocean dumping, dredged or fill material discharging, and certain types of air emissions. Contact your EPA Regional office for further information.

Table 1. Addresses of EPA Regional Contacts and States Within the Regional Office Jurisdictions

REGION I

Permit Contact, Environmental and Economic Impact Office, U.S. Environmental Protection Agency, John F. Kennedy Building, Boston, Massachusetts 02203, (617) 223–4635, FTS 223–4635.
Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont.

REGION II

Permit Contact, Permits Administration Branch, Room 432, U.S. Environmental Protection Agency, 26 Federal Plaza, New York, New York 10007, (212) 264–9880, FTS 264–9880.
New Jersey, New York, Virgin Islands, and Puerto Rico.

REGION III

Permit Contact *(3 EN 23)*, U.S. Environmental Protection Agency, 6th & Walnut Streets, Philadelphia, Pennsylvania 19106, (215) 597–8816, FTS 597–8816.
Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, and West Virginia.

REGION IV

Permit Contact, Permits Section, U.S. Environmental Protection Agency, 345 Courtland Street, N.E., Atlanta, Georgia 30365, (404) 881–2017, FTS 257–2017.
Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee.

REGION V

Permit Contact *(5EP)*, U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, (312) 353–2105, FTS 353–2105.
Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin.

Table 1 *(continued)*

REGION VI

Permit Contact *(6AEP)*, U.S. Environmental Protection Agency, First International Building, 1201 Elm Street, Dallas, Texas 75270, (214) 767–2765, FTS 729–2765.
Arkansas, Louisiana, New Mexico, Oklahoma, and Texas.

REGION VII

Permit Contact, Permits Branch, U.S. Environmental Protection Agency, 324 East 11th Street, Kansas City, Missouri 64106, (816) 758–5955, FTS 758–5955.
Iowa, Kansas, Missouri, and Nebraska.

REGION VIII

Permit Contact *(8E–WE)*, Suite 103, U.S. Environmental Protection Agency, 1816 Lincoln Street, Denver, Colorado 80203, (303) 837–4901, FTS 837–4901.
Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming.

REGION IX

Permit Contact, Permits Branch *(E–4)*, U.S. Environmental Protection Agency, 215 Fremont Street, San Francisco, California 94105, (415) 556–3450, FTS 556–3450.
Arizona, California, Hawaii, Nevada, Guam, American Samoa, and Trust Territories.

REGION X

Permit Contact *(M/S 521)*, U.S. Environmental Protection Agency, 1200 6th Avenue, Seattle, Washington 98101, (206) 442–7176, FTS 399–7176.
Alaska, Idaho, Oregon, and Washington.

Where to File

The application forms should be mailed to the EPA Regional office whose Region includes the State in which the facility is located *(see Table 1)*.

If the State in which the facility is located administers a Federal permit program under which you need a permit, you should contact the appropriate State agency for the correct forms. Your EPA Regional office *(Table 1)* can tell you to whom to apply and can provide the appropriate address and phone number.

When to File

Because of statutory requirements, the deadlines for filing applications vary according to the type of facility you operate and the type of permit you need. These deadlines are as follows:[1]

Table 2. Filing Dates for Permits

FORM*(permit)*	WHEN TO FILE
2A*(NPDES)*	180 days before your present NPDES permit expires.
2B*(NPDES)*	180 days before your present NPDES permit expires[2], or 180 days prior to start-up if you are a new facility.
2C*(NPDES)*	180 days before your present NPDES permit expires[2].
2D*(NPDES)*	180 days prior to startup.
3*(Hazardous Waste)*	Existing facility: Six months following publication of regulations listing hazardous wastes. New facility: 180 days before commencing physical construction.
4*(UIC)*	A reasonable time prior to construction for new wells; as directed by the Director for existing wells.
5*(PSD)*	Prior to commencement of construction.

[1] Please note that some of these forms are not yet available for use and are listed as "Reserved" at the beginning of these instructions. Contact your EPA Regional office for information on current application requirements and forms.

[2] If your present permit expires on or before November 30, 1980, the filing date is the date on which your permit expires. If your permit expires during the period December 1, 1980 – May 31, 1981, the filing date is 90 days before your permit expires.

Federal regulations provide that you may not begin to construct a new source in the NPDES program, a new hazardous waste management facility, a new injection well, or a facility covered by the PSD program before the issuance of a permit under the applicable program. Please note that if you are required to obtain a permit before beginning construction, as described above, you may need to submit your permit application well in advance of an applicable deadline listed in Table 2.

Fees

The U.S. EPA does not require a fee for applying for any permit under the consolidated permit programs. *(However, some States which administer one or more of these programs require fees for the permits which they issue.)*

Availability of Information to Public

Information contained in these application forms will, upon request, be made available to the public for inspection and copying. However, you may request confidential treatment for certain information which you submit on certain supplementary forms. The specific instructions for each supplementary form state what information on the form, if any, may be claimed as confidential and what procedures govern the claim. No information on Forms 1 and 2A through 2D may be claimed as confidential.

Completion of Forms

Unless otherwise specified in instructions to the forms, each item in each form must be answered. To indicate that each item has been considered, enter "NA," for not applicable, if a particular item does not fit the circumstances or characteristics of your facility or activity.

If you have previously submitted information to EPA or to an approved State agency which answers a question, you may either repeat the information in the space provided or attach a copy of the previous submission. Some items in the form require narrative explanation. If more space is necessary to answer a question, attach a separate sheet entitled "Additional Information."

Financial Assistance for Pollution Control

There are a number of direct loans, loan guarantees, and grants available to firms and communities for pollution control expenditures. These are provided by the Small Business Administration, the Economic Development Administration, the Farmers Home Administration, and the Department of Housing and Urban Development. Each EPA Regional office *(Table 1)* has an economic assistance coordinator who can provide you with additional information.

EPA's construction grants program under Title II of the Clean Water Act is an additional source of assistance to publicly owned treatment works. Contact your EPA Regional office for details.

SECTION B — FORM 1 LINE–BY–LINE INSTRUCTIONS

This form must be completed by all applicants.

Completing This Form

Please type or print in the unshaded areas only. Some items have small graduation marks in the fill–in spaces. These marks indicate the number of characters that may be entered into our data system. The marks are spaced at 1/6" intervals which accommodate elite type *(12 characters per inch)*. If you use another type you may ignore the marks. If you print, place each character between the marks. Abbreviate if necessary to stay within the number of characters allowed for each item. Use one space for breaks between words, but not for punctuation marks unless they are needed to clarify your response.

Item I

Space is provided at the upper right hand corner of Form 1 for insertion of your EPA Identification Number. If you have an existing facility, enter your Identification Number. If you don't know your EPA Identification Number, please contact your EPA Regional office *(Table 1)*, which will provide you with your number. If your facility is new *(not yet constructed)*, leave this item blank.

Item II

Answer each question to determine which supplementary forms you need to fill out. Be sure to check the glossary in Section D of these instructions for the legal definitions of the bold faced words. Check Section C of these instructions to determine whether your activity is excluded from permit requirements.

If you answer "no" to every question, then you do not need a permit, and you do not need to complete and return any of these forms.

If you answer "yes" to any question, then you must complete and file the supplementary form by the deadline listed in Table 2 along with this form. *(The applicable form number follows each question and is enclosed in parentheses.)* You need not submit a supplementary form if you already have a permit under the appropriate Federal program, unless your permit is due to expire and you wish to renew your permit.

Questions (I) and (J) of Item II refer to major new or modified sources subject to Prevention of Significant Deterioration *(PSD)* requirements under the Clean Air Act. For the purpose of the PSD program, major sources are defined as: (A) Sources listed in Table 3 which have the potential to emit 100 tons or more per year emissions; and (B) All other sources with the potential to emit 250 tons or more per year. See Section C of these instructions for discussion of exclusions of certain modified sources.

Table 3. 28 Industrial Categories Listed in Section 169(1) of the Clean Air Act of 1977

Fossil fuel–fired steam generators of more than 250 million BTU per hour heat input;
Coal cleaning plants *(with thermal dryers)*;
Kraft pulp mills;
Portland cement plants;
Primary zinc smelters;
Iron and steel mill plants;
Primary aluminum ore reduction plants;
Primary copper smelters;
Municipal incinerators capable of charging more than 250 tons of refuse per day;
Hydrofluoric acid plants;
Nitric acid plants;
Sulfuric acid plants;
Petroleum refineries;
Lime plants;
Phosphate rock processing plants;
Coke oven batteries;
Sulfur recovery plants;
Carbon black plants *(furnace process)*;
Primary lead smelters;
Fuel conversion plants;
Sintering plants;
Secondary metal production plants;
Chemical process plants;
Fossil fuel boilers *(or combination thereof)* totaling more than 250 million BTU per hour heat input;

Table 3 *(continued)*

Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels;
Taconite ore processing plants;
Glass fiber processing plants; and
Charcoal production plants.

Item III

Enter the facility's official or legal name. Do not use a colloquial name.

Item IV

Give the name, title, and work telephone number of a person who is thoroughly familiar with the operation of the facility and with the facts reported in this application and who can be contacted by reviewing offices if necessary.

Item V

Give the complete mailing address of the office where correspondence should be sent. This often is not the address used to designate the location of the facility or activity.

Item VI

Give the address or location of the facility identified in Item III of this form. If the facility lacks a street name or route number, give the most accurate alternative geographic information *(e.g., section number or quarter section number from county records or at intersection of Rts. 425 and 22)*.

Item VII

List, in descending order of significance, the four 4–digit standard industrial classification *(SIC)* codes which best describe your facility in terms of the principal products or services you produce or provide. Also, specify each classification in words. These classifications may differ from the SIC codes describing the operation generating the discharge, air emissions, or hazardous wastes.

SIC code numbers are descriptions which may be found in the "Standard Industrial Classification Manual" prepared by the Executive Office of the President, Office of Management and Budget, which is available from the Government Printing Office, Washington, D.C. Use the current edition of the manual. If you have any questions concerning the appropriate SIC code for your facility, contact your EPA Regional office *(see Table 1)*.

Item VIII–A

Give the name, as it is legally referred to, of the person, firm, public organization, or any other entity which operates the facility described in this application. This may or may not be the same name as the facility. The operator of the facility is the legal entity which controls the facility's operation rather than the plant or site manager. Do not use a colloquial name.

Item VIII–B

Indicate whether the entity which operates the facility also owns it by marking the appropriate box.

Item VIII–C

Enter the appropriate letter to indicate the legal status of the operator of the facility. Indicate "public" for a facility solely owned by local government*(s)* such as a city, town, county, parish, etc.

Items VIII–D – H

Enter the telephone number and address of the operator identified in Item VIII–A.

Item IX

Indicate whether the facility is located on Indian Lands.

Item X

Give the number of each presently effective permit issued to the facility for each program or, if you have previously filed an application but have not yet received a permit, give the number of the application, if any. Fill in the unshaded area only. If you have more than one currently effective permit for your facility under a particular permit program, you may list additional permit numbers on a separate sheet of paper. List any relevant environmental Federal *(e.g., permits under the Ocean Dumping Act, Section 404 of the Clean Water Act or the Surface Mining Control and Reclamation Act)*, State *(e.g., State permits for new air emission sources in nonattainment areas under Part D of the Clean Air Act or State permits under Section 404 of the Clean Water Act)*, or local permits or applications under "other."

Item XI

Provide a topographic map or maps of the area extending at least to one mile beyond the property boundaries of the facility which clearly show the following:

The legal boundaries of the facility;

The location and serial number of each of your existing and proposed intake and discharge structures;

All hazardous waste management facilities;

Each well where you inject fluids underground; and

All springs and surface water bodies in the area, plus all drinking water wells within 1/4 mile of the facility which are identified in the public record or otherwise known to you.

If an intake or discharge structure, hazardous waste disposal site, or injection well associated with the facility is located more than one mile from the plant, include it on the map, if possible. If not, attach additional sheets describing the location of the structure, disposal site, or well, and identify the U.S. Geological Survey *(or other)* map corresponding to the location.

On each map, include the map scale, a meridian arrow showing north, and latitude and longitude at the nearest whole second. On all maps of rivers, show the direction of the current, and in tidal waters, show the directions of the ebb and flow tides. Use a 7-1/2 minute series map published by the U.S. Geological Survey, which may be obtained through the U.S. Geological Survey Offices listed below. If a 7-1/2 minute series map has not been published for your facility site, then you may use a 15 minute series map from the U.S. Geological Survey. If neither a 7-1/2 nor 15 minute series map has been published for your facility site, use a plat map or other appropriate map, including all the requested information; in this case, briefly describe land uses in the map area *(e.g., residential, commercial)*.

You may trace your map from a geological survey chart, or other map meeting the above specifications. If you do, your map should bear a note showing the number or title of the map or chart it was traced from. Include the names of nearby towns, water bodies, and other prominent points. An example of an acceptable location map is shown in Figure 1–1 of these instructions. *(NOTE: Figure 1–1 is provided for purposes of illustration only, and does not represent any actual facility.)*

U.S.G.S. OFFICES	AREA SERVED
Eastern Mapping Center National Cartographic Information Center U.S.G.S. 536 National Center Reston, Va. 22092 Phone No. (703) 860–6336	Ala., Conn., Del., D.C., Fla., Ga., Ind., Ky., Maine, Md., Mass., N.H., N.J., N.Y., N.C., S.C., Ohio, Pa., Puerto Rico, R.I., Tenn., Vt., Va., W. Va., and Virgin Islands.
Mid Continent Mapping Center National Cartographic Information Center U.S.G.S. 1400 Independance Road Rolla, Mo. 65401 Phone No. (314) 341–0851	Ark., Ill., Iowa, Kans., La., Mich., Minn., Miss., Mo., N. Dak., Nebr., Okla., S. Dak., and Wis.
Rocky Mountain Mapping Center National Cartographic Infomation Center U.S.G.S. Stop 504, Box 25046 Federal Center Denver, Co. 80225 Phone No. (303) 234–2326	Alaska, Colo., Mont., N. Mex., Tex., Utah, and Wyo.
Western Mapping Center National Cartographic Information Center U.S.G.S. 345 Middlefield Road Menlo Park, Ca. 94025 Phone No. (415) 323–8111	Ariz., Calif., Hawaii, Idaho, Nev., Oreg., Wash., American Samoa, Guam, and Trust Territories

Item XII

Briefly describe the nature of your business *(e.g., products produced or services provided)*.

Item XIII

Federal statues provide for severe penalties for submitting false information on this application form.

18 U.S.C. Section 1001 provides that "Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or device a material fact, or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statement or entry, shall be fined not more than $10,000 or imprisoned not more than five years, or both."

Section 309(c)(2) of the Clean Water Act and Section 113(c)(2) of the Clean Air Act each provide that "Any person who knowingly makes any false statement, representation, or certification in any application, . . . shall upon conviction, be punished by a fine of no more than $10,000 or by imprisonment for not more than six months, or both."

In addition, Section 3008(d)(3) of the Resource Conservation and Recovery Act provides for a fine up to $25,000 per day or imprisonment up to one year, or both, for a first conviction for making a false statement in any application under the Act, and for double these penalties upon subsequent convictions.

FEDERAL REGULATIONS REQUIRE THIS APPLICATION TO BE SIGNED AS FOLLOWS:

A. For a corporation, by a principal executive officer of at least the level of vice president. However, if the only activity in Item II which is marked "yes" is Question G, the officer may authorize a person having responsibility for the overall operations of the well or well field to sign the certification. In that case, the authorization must be written and submitted to the permitting authority.

B. For partnership or sole proprietorship, by a general partner or the proprietor, respectively; or

C. For a municipality, State, Federal, or other public facility, by either a principal executive officer or ranking elected official.

SECTION C – ACTIVITIES WHICH DO NOT REQUIRE PERMITS

I. National Pollutant Discharge Elimination System Permits Under the Clean Water Act. You are not required to obtain an NPDES permit if your discharge is in one of the following categories, as provided by the Clean Water Act *(CWA)* and by the NPDES regulations *(40 CFR Parts 122–125)*. However, under Section 510 of CWA a discharge exempted from the federal NPDES requirements may still be regulated by a State authority; contact your State environmental agency to determine whether you need a State permit.

A. DISCHARGES FROM VESSELS. Discharges of sewage from vessels, effluent from properly functioning marine engines, laundry, shower, and galley sink wastes, and any other discharge incidental to the normal operation of a vessel do not require NPDES permits. However, discharges of rubbish, trash, garbage, or other such materials discharged overboard require permits, and so do other discharges when the vessel is operating in a capacity other than as a means of transportation, such as when the vessel is being used as an energy or mining facility, a storage facility, or a seafood processing facility, or is secured to the bed of the ocean, contiguous zone, or waters of the United States for the purpose of mineral or oil exploration or development.

B. DREDGED OR FILL MATERIAL. Discharges of dredged or fill material into waters of the United States do not need NPDES permits if the dredging or filling is authorized by a permit issued by the U.S. Army Corps of Engineers or an EPA approved State under Section 404 of CWA.

C. DISCHARGES INTO PUBLICLY OWNED TREATMENT WORKS *(POTW)*. The introduction of sewage, industrial wastes, or other pollutants into a POTW does not need an NPDES permit. You must comply with all applicable pretreatment standards promulgated under Section 307(b) of CWA, which may be included in the permit issued to the POTW. If you have a plan or an agreement to switch to a POTW in the future, this does not relieve you of the obligation to apply for and receive an NPDES permit until you have stopped discharging pollutants into waters of the United States.

(NOTE: Dischargers into privately owned treatment works do not have to apply for or obtain NPDES permits except as otherwise required by the EPA Regional Administrator. The owner or operator of the treatment works itself, however, must apply for a permit and identify all users in its application. Users so identified will receive public notice of actions taken on the permit for the treatment works.)

D. DISCHARGES FROM AGRICULTURAL AND SILVICULTURAL ACTIVITIES. Most discharges from agricultural and silvicultural activities to waters of the United States do not require NPDES permits. These include runoff from orchards, cultivated crops, pastures, range lands, and forest lands. However, the discharges listed below do require NPDES permits. Definitions of the terms listed below are contained in the Glossary section of these instructions.

1. Discharges from Concentrated Animal Feeding Operations. *(See Glossary for definitions of "animal feeding operations" and "concentrated animal feeding operations." Only the latter require permits.)*

2. Discharges from Concentrated Aquatic Animal Production Facilities. *(See Glossary for size cutoffs.)*

3. Discharges associated with approved Aquaculture Projects.

4. Discharges from Silvicultural Point Sources. *(See Glossary for the definition of "silvicultural point source.")* Nonpoint source silvicultural activities are excluded from NPDES permit requirements. However, some of these activities, such as stream crossings for roads, may involve point source discharges of dredged or fill material which may require a Section 404 permit. See 33 CFR 209.120.

E. DISCHARGES IN COMPLIANCE WITH AN ON–SCENE COORDINATOR'S INSTRUCTIONS.

II. Hazardous Waste Permits Under the Resource Conservation and Recovery Act. You may be excluded from the requirement to obtain a permit under this program if you fall into one of the following categories:

Generators who accumulate their own hazardous waste on–site for less than 90 days as provided in 40 CFR 262.34;

Farmers who dispose of hazardous waste pesticide from their own use as provided in 40 CFR 262.51;

Certain persons treating, storing, or disposing of small quantities of hazardous waste as provided in 40 CFR 261.4 or 261.5; and

Owners and operators of totally enclosed treatment facilities as defined in 40 CFR 260.10.

Check with your Regional office for details. Please note that even if you are excluded from permit requirements, you may be required by Federal regulations to handle your waste in a particular manner.

III. Underground Injection Control Permits Under the Safe Drinking Water Act. You are not required to obtain a permit under this program if you:

Inject into existing wells used to enhance recovery of oil and gas or to store hydrocarbons *(note, however, that these underground injections are regulated by Federal rules)*; or

Inject into or above a stratum which contains, within 1/4 mile of the well bore, an underground source of drinking water *(unless your injection is the type identified in Item II-H, for which you do need a permit)*. However, you must notify EPA of your injection and submit certain required information on forms supplied by the Agency, and your operation may be phased out if you are a generator of hazardous wastes or a hazardous waste management facility which uses wells or septic tanks to dispose of hazardous waste.

IV. Prevention of Significant Deterioration Permits Under the Clean Air Act. The PSD program applies to newly constructed or modified facilities *(both of which are referred to as "new sources")* which increase air emissions. The Clean Air Act Amendments of 1977 exclude small new sources of air emissions from the PSD review program. Any new source in an industrial category listed in Table 3 of these instructions whose potential to emit is less than 100 tons per year is not required to get a PSD permit. In addition, any new source in an industrial category not listed in Table 3 whose potential to emit is less than 250 tons per year is exempted from the PSD requirements.

Modified sources which increase their net emissions *(the difference between the total emission increases and total emission decreases at the source)* less than the significant amount set forth in EPA regulations are also exempt from PSD requirements. Contact your EPA Regional office *(Table 1)* for further information.

SECTION D – GLOSSARY

NOTE: This Glossary includes terms used in the instructions and in Forms 1, 2B, 2C, and 3. Additional terms will be included in the future when other forms are developed to reflect the requirements of other parts of the Consolidated Permits Program. If you have any questions concerning the meaning of any of these terms, please contact your EPA Regional office *(Table 1)*.

ALIQUOT means a sample of specified volume used to make up a total composite sample.

ANIMAL FEEDING OPERATION means a lot or facility *(other than an aquatic animal production facility)* where the following conditions are met:

A. Animals *(other than aquatic animals)* have been, are, or will be stabled or confined and fed or maintained for a total of 45 days or more in any 12 month period; and

B. Crops, vegetation, forage growth, or post–harvest residues are not sustained in the normal growing season over any portion of the lot or facility.

Two or more animal feeding operations under common ownership are a single animal feeding operation if they adjoin each other or if they use a common area or system for the disposal of wastes.

ANIMAL UNIT means a unit of measurement for any animal feeding operation calculated by adding the following numbers: The number of slaughter and feeder cattle multiplied by 1.0; Plus the number of mature dairy cattle multiplied by 1.4; Plus the number of swine weighing over 25 kilograms *(approximately 55 pounds)* multiplied by 0.4; Plus the number of sheep multiplied by 0.1; Plus the number of horses multiplied by 2.0.

APPLICATION means the EPA standard national forms for applying for a permit, including any additions, revisions, or modifications to the forms; or forms approved by EPA for use in approved States, including any approved modifications or revisions. For RCRA, "application" also means "Application, Part B."

APPLICATION, PART A means that part of the Consolidated Permit Application forms which a RCRA permit applicant must complete to qualify for interim status under Section 3005(e) of RCRA and for consideration for a permit. Part A consists of Form 1 *(General Information)* and Form 3 *(Hazardous Waste Application Form)*.

APPLICATION, PART B means that part of the application which a RCRA permit applicant must complete to be issued a permit. *(NOTE: EPA is not developing a specific form for Part B of the permit application, but an instruction booklet explaining what information must be supplied is available from the EPA Regional office.)*

APPROVED PROGRAM or APPROVED STATE means a State program which has been approved or authorized by EPA under 40 CFR Part 123.

AQUACULTURE PROJECT means a defined managed water area which uses discharges of pollutants into that designated area for the maintenance or production of harvestable freshwater, estuarine, or marine plants or animals. "Designated area" means the portions of the waters of the United States within which the applicant plans to confine the cultivated species, using a method of plan or operation *(including, but not limited to, physical confinement)* which, on the basis of reliable scientific evidence, is expected to ensure the specific individual organisms comprising an aquaculture crop will enjoy increased growth attributable to the discharge of pollutants and be harvested within a defined geographic area.

AQUIFER means a geological formation, group of formations, or part of a formation that is capable of yielding a significant amount of water to a well or spring.

AREA OF REVIEW means the area surrounding an injection well which is described according to the criteria set forth in 40 CFR Section 146.06.

AREA PERMIT means a UIC permit applicable to all or certain wells within a geographic area, rather than to a specified well, under 40 CFR Section 122.37.

ATTAINMENT AREA means, for any air pollutant, an area which has been designated under Section 107 of the Clean Air Act as having ambient air quality levels better than any national primary or secondary ambient air quality standard for that pollutant. Standards have been set for sulfur oxides, particulate matter, nitrogen dioxide, carbon monoxide, ozone, lead, and hydrocarbons. For purposes of the Glossary, "attainment area" also refers to "unclassifiable area," which means, for any pollutants, an area designated under Section 107 as unclassifiable with respect to that pollutant due to insufficient information.

BEST MANAGEMENT PRACTICES *(BMP)* means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States. BMP's include treatment requirements, operation procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

BIOLOGICAL MONITORING TEST means any test which includes the use of aquatic algal, invertebrate, or vertebrate species to measure acute or chronic toxicity, and any biological or chemical measure of bioaccumulation.

BYPASS means the intentional diversion of wastes from any any portion of a treatment facility.

CONCENTRATED ANIMAL FEEDING OPERATION means an animal feeding operation which meets the criteria set forth in either (A) or (B) below or which the Director designates as such on a case–by–case basis:

A. More than the numbers of animals specified in any of the following categories are confined:

1. 1,000 slaughter or feeder cattle,

2. 700 mature dairy cattle *(whether milked or dry cows)*,

3. 2,500 swine each weighing over 25 kilograms *(approximately 55 pounds)*,

4. 500 horses,

5. 10,000 sheep or lambs,

6. 55,000 turkeys,

7. 100,000 laying hens or broilers *(if the facility has a continuous overflow watering)*,

8. 30,000 laying hens or broilers *(if the facility has a liquid manure handling system)*,

9. 5,000 ducks, or

10. 1,000 animal units; or

B. More than the following numbers and types of animals are confined:

1. 300 slaughter or feeder cattle,

2. 200 mature dairy cattle *(whether milked or dry cows)*,

3. 750 swine each weighing over 25 kilograms *(approximately 55 pounds)*,

4. 150 horses,

CONCENTRATED ANIMAL FEEDING OPERATION *(continued)*

5. 3,000 sheep or lambs,

6. 16,500 turkeys,

7. 30,000 laying hens or broilers *(if the facility has continuous overflow watering)*,

8. 9,000 laying hens or broilers *(if the facility has a liquid manure handling system)*,

9. 1,500 ducks, or

10. 300 animal units; AND

Either one of the following conditions are met: Pollutants are discharged into waters of the United States through a manmade ditch, flushing system or other similar manmade device *("manmade" means constructed by man and used for the purpose of transporting wastes)*; or Pollutants are discharged directly into waters of the Unites States which originate outside of and pass over, across, or through the facility or otherwise come into direct contact with the animals confined in the operation.

Provided, however, that no animal feeding operation is a concentrated animal feeding operation as defined above if such animal feeding operation discharges only in the event of a 25 year, 24 hour storm event.

CONCENTRATED AQUATIC ANIMAL PRODUCTION FACILITY means a hatchery, fish farm, or other facility which contains, grows or holds aquatic animals in either of the following categories, or which the Director designates as such on a case–by–case basis:

A. Cold water fish species or other cold water aquatic animals including, but not limited to, the Salmonidae family of fish *(e.g., trout and salmon)* in ponds, raceways or other similar structures which discharge at least 30 days per year but does not include:

1. Facilities which produce less than 9,090 harvest weight kilograms *(approximately 20,000 pounds)* of aquatic animals per year; and

2. Facilities which feed less than 2,272 kilograms *(approximately 5,000 pounds)* of food during the calendar month of maximum feeding.

B. Warm water fish species or other warm water aquatic animals including, but not limited to, the Ameiuridae, Cetrarchidae, and Cyprinidae families of fish *(e.g., respectively, catfish, sunfish, and minnows)* in ponds, raceways, or other similar structures which discharge at least 30 days per year, but does not include:

1. Closed ponds which discharge only during periods of excess runoff; or

2. Facilities which produce less than 45,454 harvest weight kilograms *(approximately 100,000 pounds)* of aquatic animals per year.

CONTACT COOLING WATER means water used to reduce temperature which comes into contact with a raw material, intermediate product, waste product other than heat, or finished product.

CONTAINER means any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled.

CONTIGUOUS ZONE means the entire zone established by the United States under article 24 of the convention of the Territorial Sea and the Contiguous Zone.

CWA means the Clean Water Act *(formerly referred to the Federal Water Pollution Control Act)* Pub. L. 92–500, as amended by Pub. L. 95–217 and Pub. L. 95–576, 33 U.S.C. 1251 *et seq.*

DIKE means any embankment or ridge of either natural or manmade materials used to prevent the movement of liquids, sludges, solids, or other materials.

DIRECT DISCHARGE means the discharge of a pollutant as defined below.

DIRECTOR means the EPA Regional Administrator or the State Director as the context requires.

DISCHARGE *(OF A POLLUTANT)* means:

A. Any addition of any pollutant or combination of pollutants to waters of the United States from any point source; or

B. Any addition of any pollutant or combination of pollutants to the waters of the contiguous zone or the ocean from any point source other than a vessel or other floating craft which is being used as a means of transportation.

This definition includes discharges into waters of the United States from: Surface runoff which is collected or channelled by man; Discharges through pipes, sewers, or other conveyances owned by a State, municipality, or other person which do not lead to POTW's; and Discharges through pipes, sewers, or other conveyances, leading into privately owned treatment works. This term does not include an addition of pollutants by any indirect discharger.

DISPOSAL *(in the RCRA program)* means the discharge, deposit, injection, dumping, spilling, leaking, or placing of any hazardous waste into or on any land or water so that the hazardous waste or any constituent of it may enter the environment or be emitted into the air or discharged into any waters, including ground water.

DISPOSAL FACILITY means a facility or part of a facility at which hazardous waste is intentionally placed into or on land or water, and at which hazardous waste will remain after closure.

EFFLUENT LIMITATION means any restriction imposed by the Director on quantities, discharge rates, and concentrations of pollutants which are discharged from point sources into waters of the United States, the waters of the continguous zone, or the ocean.

EFFLUENT LIMITATION GUIDELINE means a regulation published by the Administrator under Section 304(b) of the Clean Water Act to adopt or revise effluent limitations.

ENVIRONMENTAL PROTECTION AGENCY *(EPA)* means the United States Environmental Protection Agency.

EPA IDENTIFICATION NUMBER means the number assigned by EPA to each generator, transporter, and facility.

EXEMPTED AQUIFER means an aquifer or its portion that meets the criteria in the definition of USDW, but which has been exempted according to the procedures in 40 CFR Section 122.35(b).

EXISTING HWM FACILITY means a Hazardous Waste Management facility which was in operation, or for which construction had commenced, on or before October 21, 1976. Construction had commenced if (A) the owner or operator had obtained all necessary Federal, State, and local preconstruction approvals or permits, and either (B1) a continuous on–site, physical construction program had begun, or (B2) the owner or operator had entered into contractual obligations, which could not be cancelled or modified without substantial loss, for construction of the facility to be completed within a reasonable time.

(NOTE: This definition reflects the literal language of the statute. However, EPA believes that amendments to RCRA now in conference will shortly be enacted and will change the date for determining when a facility is an "existing facility" to one no earlier than May of 1980; indications are the conferees are considering October 30, 1980. Accordingly, EPA encourages every owner or operator of a facility which was built or under construction as of the promulgation date of the RCRA program regulations to file Part A of its permit application so that it can be quickly processed for interim status when the change in the law takes effect. When those amendments are enacted, EPA will amend this definition.)

EXISTING SOURCE or EXISTING DISCHARGER *(in the NPDES program)* means any source which is not a new source or a new discharger.

EXISTING INJECTION WELL means an injection well other than a new injection well.

FACILITY means any HWM facility, UIC underground injection well, NPDES point source, PSD stationary source, or any other facility or activity *(including land or appurtenances thereto)* that is subject to regulation under the RCRA, UIC, NPDES, or PSD programs.

FLUID means material or substance which flows or moves whether in a semisolid, liquid, sludge, gas, or any other form or state.

GENERATOR means any person by site, whose act or process produces hazardous waste identified or listed in 40 CFR Part 261.

GROUNDWATER means water below the land surface in a zone of saturation.

HAZARDOUS SUBSTANCE means any of the substances designated under 40 CFR Part 116 pursuant to Section 311 of CWA. *(NOTE: These substances are listed in Table 2c–4 of the instructions to Form 2C.)*

HAZARDOUS WASTE means a hazardous waste as defined in 40 CFR Section 261.3 published May 19, 1980.

HAZARDOUS WASTE MANAGEMENT FACILITY *(HWM facility)* means all contiguous land, structures, appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous wastes. A facility may consist of several treatment, storage, or disposal operational units *(for example, one or more landfills, surface impoundments, or combinations of them)*.

IN OPERATION means a facility which is treating, storing, or disposing of hazardous waste.

INCINERATOR *(in the RCRA program)* means an enclosed device using controlled flame combustion, the primary purpose of which is to thermally break down hazardous waste. Examples of incinerators are rotary kiln, fluidized bed, and liquid injection incinerators.

INDIRECT DISCHARGER means a nondomestic discharger introducing pollutants to a publicly owned treatment works.

INJECTION WELL means a well into which fluids are being injected.

INTERIM AUTHORIZATION means approval by EPA of a State hazardous waste program which has met the requirements of Section 3006(c) of RCRA and applicable requirements of 40 CFR Part 123, Subparts A, B, and F.

LANDFILL means a disposal facility or part of a facility where hazardous waste is placed in or on land and which is not a land treatment facility, a surface impoundment, or an injection well.

LAND TREATMENT FACILITY *(in the RCRA program)* means a facility or part of a facility at which hazardous waste is applied onto or incorporated into the soil surface; such facilities are disposal facilities if the waste will remain after closure.

LISTED STATE means a State listed by the Administrator under Section 1422 of SDWA as needing a State UIC program.

MGD means millions of gallons per day.

MUNICIPALITY means a city, village, town, borough, county, parish, district, association, or other public body created by or under State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of CWA.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)* means the national program for issuing modifying, revoking and reissuing, terminating, monitoring, and enforcing permits and imposing and enforcing pretreatment requirements, under Sections 307, 318, 402, and 405 of CWA. The term includes an approved program.

NEW DISCHARGER means any building, structure, facility, or installation: (A) From which there is or may be a new or additional discharge of pollutants at a site at which on October 18, 1972, it had never discharged pollutants; (B) Which has never received a finally effective NPDES permit for discharges at that site; and (C) Which is not a "new source." This definition includes an indirect discharger which commences discharging into waters of the United States. It also includes any existing mobile point source, such as an offshore oil drilling rig, seafood processing vessel, or aggregate plant that begins discharging at a location for which it does not have an existing permit.

NEW HWM FACILITY means a Hazardous Waste Management facility which began operation or for which construction commenced after October 21, 1976.

NEW INJECTION WELL means a well which begins injection after a UIC program for the State in which the well is located is approved.

NEW SOURCE *(in the NPDES program)* means any building, structure, facility, or installation from which there is or may be a discharge of pollutants, the construction of which commenced:

A. After promulgation of standards of performance under Section 306 of CWA which are applicable to such source; or

B. After proposal of standards of performance in accordance with Section 306 of CWA which are applicable to such source, but only if the standards are promulgated in accordance with Section 306 within 120 days of their proposal.

NON–CONTACT COOLING WATER means water used to reduce temperature which does not come into direct contact with any raw material, intermediate product, waste product *(other than heat)*, or finished product.

OFF–SITE means any site which is not "on–site."

ON–SITE means on the same or geographically contiguous property which may be divided by public or private right*(s)*–of–way, provided the entrance and exit between the properties is at a cross–roads intersection, and access is by crossing as opposed to going along, the right*(s)*–of–way. Non–contiguous properties owned by the same person, but connected by a right–of–way which the person controls and to which the public does not have access, is also considered on–site property.

OPEN BURNING means the combustion of any material without the following characteristics:

A. Control of combustion air to maintain adequate temperature for efficient combustion;

B. Containment of the combustion–reaction in an enclosed device to provide sufficient residence time and mixing for complete combustion; and

C. Control of emission of the gaseous combustion products.

(See also "incinerator" and "thermal treatment").

OPERATOR means the person responsible for the overall operation of a facility.

OUTFALL means a point source.

OWNER means the person who owns a facility or part of a facility.

PERMIT means an authorization, license, or equivalent control document issued by EPA or an approved State to implement the requirements of 40 CFR Parts 122, 123, and 124.

PHYSICAL CONSTRUCTION *(in the RCRA program)* means excavation, movement of earth, erection of forms or structures, or similar activity to prepare a HWM facility to accept hazardous waste.

PILE means any noncontainerized accumulation of solid, nonflowing hazardous waste that is used for treatment or storage.

POINT SOURCE means any discernible, confined, and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture.

POLLUTANT means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical waste, biological materials, radioactive materials *(except those regulated under the Atomic Energy Act of 1954, as amended [42 U.S.C. Section 2011 et seq.])*, heat, wrecked or discarded equipment, rocks, sand, cellar dirt and industrial, municipal, and agriculture waste discharged into water. It does not mean:

A. Sewage from vessels; or

B. Water, gas, or other material which is injected into a well to facilitate production of oil or gas, or water derived in association with oil and gas production and disposed of in a well, if the well used either to facilitate production or for disposal purposes is approved by authority of the State in which the well is located, and if the State determines that the injection or disposal will not result in the degradation of ground or surface water resources.

(NOTE: Radioactive materials covered by the Atomic Energy Act are those encompassed in its definition of source, byproduct, or special nuclear materials. Examples of materials not covered include radium and accelerator produced isotopes. See Train v. Colorado Public Interest Research Group, Inc., 426 U.S. 1 (1976).)

PREVENTION OF SIGNIFICANT DETERIORATION *(PSD)* means the national permitting program under 40 CFR 52.21 to prevent emissions of certain pollutants regulated under the Clean Air Act from significantly deteriorating air quality in attainment areas.

PRIMARY INDUSTRY CATEGORY means any industry category listed in the NRDC Settlement Agreement *(Natural Resources Defense Council v. Train, 8 ERC 2120 [D.D.C. 1976], modified 12 ERC 1833 (D.D.C. 1979))*.

PRIVATELY OWNED TREATMENT WORKS means any device or system which is: (A) Used to treat wastes from any facility whose operator is not the operator of the treatment works; and (B) Not a POTW.

PROCESS WASTEWATER means any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.

PUBLICLY OWNED TREATMENT WORKS or POTW means any device or system used in the treatment *(including recycling and reclamation)* of municipal sewage or industrial wastes of a liquid nature which is owned by a State or municipality. This definition includes any sewers, pipes, or other conveyances only if they convey wastewater to a POTW providing treatment.

RENT means use of another's property in return for regular payment.

RCRA means the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act of 1976 *(Pub. L. 94–580, as amended by Pub. L. 95–609, 42 U.S.C. Section 6901 et seq.)*.

ROCK CRUSHING AND GRAVEL WASHING FACILITIES are facilities which process crushed and broken stone, gravel, and riprap *(see 40 CFR Part 436, Subpart B, and the effluent limitations guidelines for these facilities)*.

SDWA means the Safe Drinking Water Act *(Pub. L. 95–523, as amended by Pub. L. 95–1900, 42 U.S.C. Section 300(f) et seq.)*.

SECONDARY INDUSTRY CATEGORY means any industry category which is not a primary industry category.

SEWAGE FROM VESSELS means human body wastes and the wastes from toilets and other receptacles intended to receive or retain body wastes that are discharged from vessels and regulated under Section 312 of CWA, except that with respect to commercial vessels on the Great Lakes this term includes graywater. For the purposes of this definition, "graywater" means galley, bath, and shower water.

SEWAGE SLUDGE means the solids, residues, and precipitate separated from or created in sewage by the unit processes of a POTW. "Sewage" as used in this definition means any wastes, including wastes from humans, households, commercial establishments, industries, and storm water runoff, that are discharged to or otherwise enter a publicly owned treatment works.

SILVICULTURAL POINT SOURCE means any discernable, confined, and discrete conveyance related to rock crushing, gravel washing, log sorting, or log storage facilities which are operated in connection with silvicultural activities and from which pollutants are discharged into waters of the United States. This term does not include nonpoint source silvicultural activities such as nursery operations, site preparation, reforestation and subsequent cultural treatment, thinning, prescribed burning, pest and fire control, harvesting operations, surface drainage, or road construction and maintenance from which there is natural runoff. However, some of these activities *(such as stream crossing for roads)* may involve point source discharges of dredged or fill material which may require a CWA Section 404 permit. "Log sorting and log storage facilities" are facilities whose discharges result from the holding of unprocessed wood, e.g., logs or roundwood with bark or after removal of bark in self–contained bodies of water *(mill ponds or log ponds)* or stored on land where water is applied intentionally on the logs *(wet decking)*. *(See 40 CFR Part 429, Subpart J, and the effluent limitations guidelines for these facilities.)*

STATE means any of the 50 States, the District of Columbia, Guam, the Commonwealth of Puerto Rico, the Virgin Islands, American Samoa, the Trust Territory of the Pacific Islands *(except in the case of RCRA)*, and the Commonwealth of the Northern Mariana Islands *(except in the case of CWA)*.

STATIONARY SOURCE *(in the PSD program)* means any building, structure, facility, or installation which emits or may emit any air pollutant regulated under the Clean Air Act. "Building, structure, facility, or installation" means any grouping of pollutant–emitting activities which are located on one or more contiguous or adjacent properties and which are owned or operated by the same person *(or by persons under common control)*.

STORAGE *(in the RCRA program)* means the holding of hazardous waste for a temporary period at the end of which the hazardous waste is treated, disposed, or stored elsewhere.

STORM WATER RUNOFF means water discharged as a result of rain, snow, or other precipitation.

SURFACE IMPOUNDMENT or IMPOUNDMENT means a facility or part of a facility which is a natural topographic depression, manmade excavation, or diked area formed primarily of earthen materials *(although it may be lined with manmade materials)*, which is designed to hold an accumulation of liquid wastes or wastes containing free liquids, and which is not an injection well. Examples of surface impoundments are holding, storage, settling, and aeration pits, ponds, and lagoons.

TANK *(in the RCRA program)* means a stationary device, designed to contain an accumulation of hazardous waste which is constructed primarily of non–earthen materials *(e.g., wood, concrete, steel, plastic)* which provide structural support.

THERMAL TREATMENT *(in the RCRA program)* means the treatment of hazardous waste in a device which uses elevated temperature as the primary means to change the chemical, physical, or biological character or composition of the hazardous waste. Examples of thermal treatment processes are incineration, molten salt, pyrolysis, calcination, wet air oxidation, and microwave discharge. *(See also "incinerator" and "open burning").*

TOTALLY ENCLOSED TREATMENT FACILITY *(in the RCRA program)* means a facility for the treatment of hazardous waste which is directly connected to an industrial production process and which is constructed and operated in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment during treatment. An example is a pipe in which waste acid is neutralized.

TOXIC POLLUTANT means any pollutant listed as toxic under Section 307(a)(1) of CWA.

TRANSPORTER *(in the RCRA program)* means a person engaged in the off–site transportation of hazardous waste by air, rail, highway, or water.

TREATMENT *(in the RCRA program)* means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non–hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume.

UNDERGROUND INJECTION means well injection.

UNDERGROUND SOURCE OF DRINKING WATER or USDW means an aquifer or its portion which is not an exempted aquifer and:

A. Which supplies drinking water for human consumption; or

B. In which the ground water contains fewer than 10,000 mg/l total dissolved solids.

UPSET means an exceptional incident in which there is unintentional and temporary noncompliance with technology–based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

WATERS OF THE UNITED STATES means:

A. All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;

B. All interstate waters, including interstate wetlands;

C. All other waters such as intrastate lakes, rivers, streams *(including intermittent streams)*, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, and natural ponds, the use, degradation, or destruction of which would or could affect interstate or foreign commerce including any such waters:

1. Which are or could be used by interstate or foreign travelers for recreational or other purposes,

2. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce,

3. Which are used or could be used for industrial purposes by industries in interstate commerce;

D. All impoundments of waters otherwise defined as waters of the United States under this definition;

E. Tributaries of waters identified in paragraphs (A) – (D) above;

F. The territorial sea; and

G. Wetlands adjacent to waters *(other than waters that are themselves wetlands)* identified in paragraphs (A) – (F) of this definition.

Waste treatment systems, including treatment ponds or lagoons designed to meet requirement of CWA *(other than cooling ponds as defined in 40 CFR Section 423.11(m) which also meet the criteria of this definition)* are not waters of the United States. This exclusion applies only to manmade bodies of water which neither were originally created in waters of the United States *(such as a disposal area in wetlands)* nor resulted from the impoundments of waters of the United States.

WELL INJECTION or UNDERGROUND INJECTION means the subsurface emplacement of fluids through a bored, drilled, or driven well; or through a dug well, where the depth of the dug well is greater than the largest surface dimension.

WETLANDS means those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

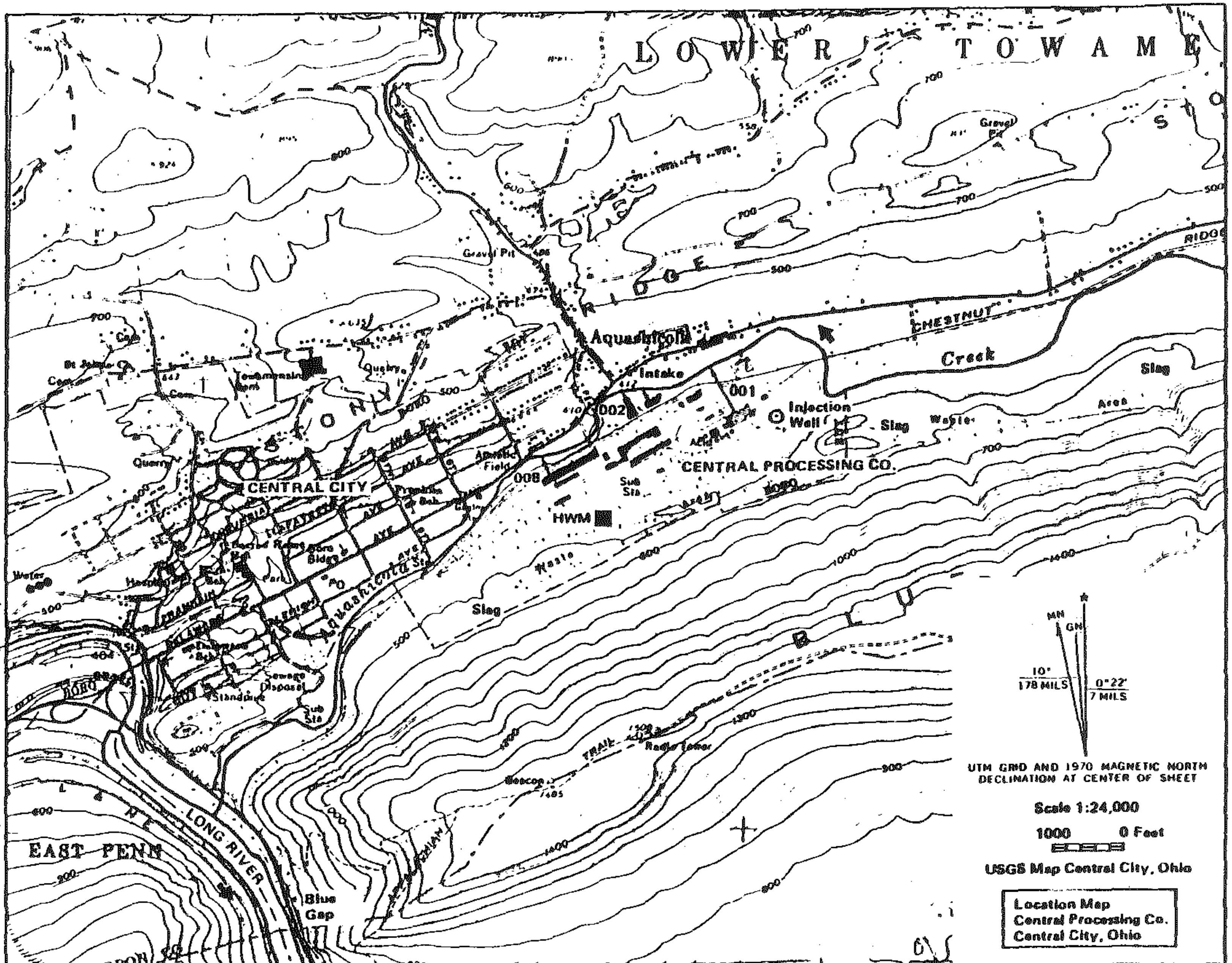
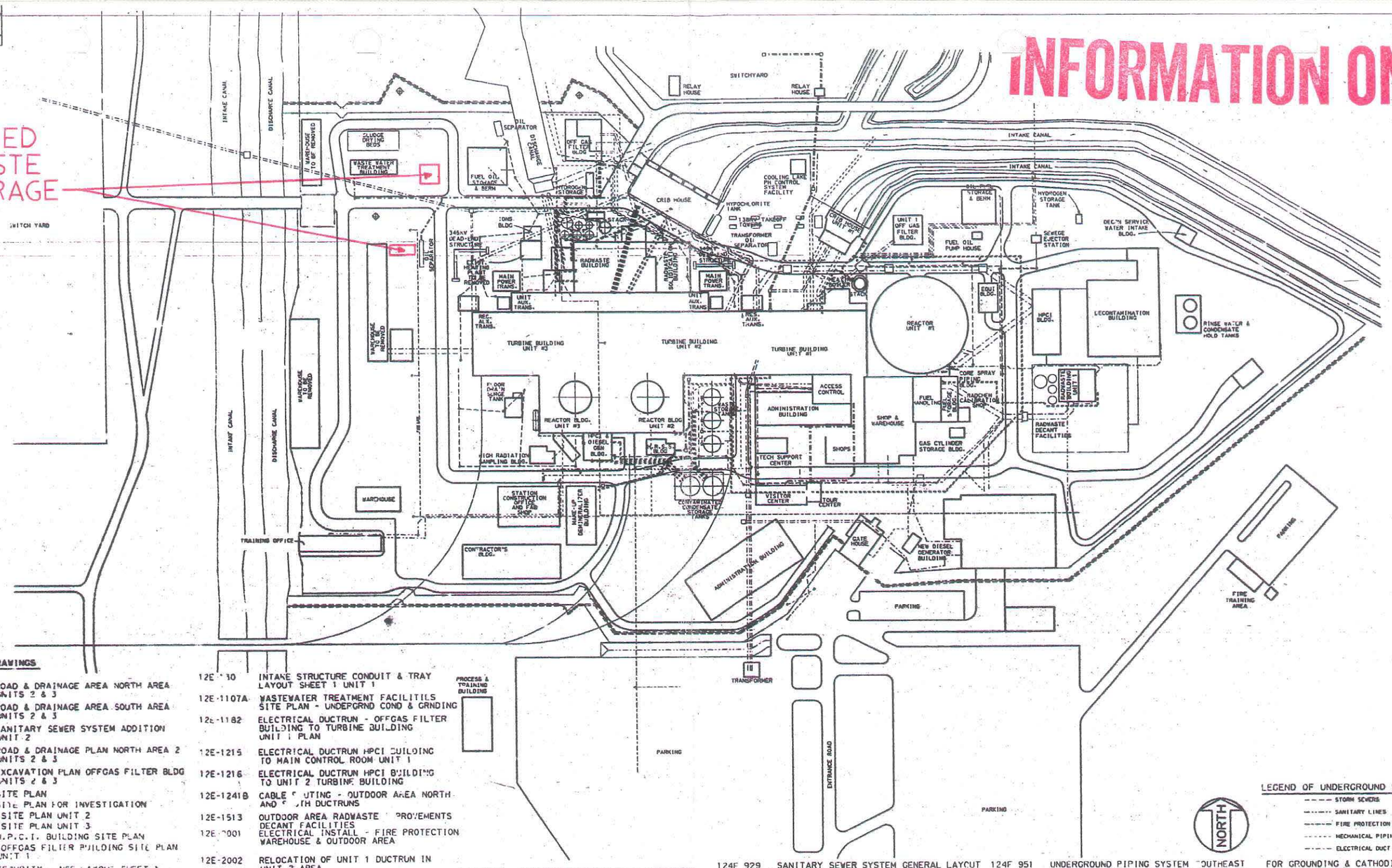

LOWER TOWAME
RIDGE
CHESTNUT
Creek
Aquashicola
Intake
002
001
Injection Well
Slag
Slag Waste Area
CENTRAL PROCESSING CO.
008
HWM
Sub Sta
Athletic Field
CENTRAL CITY
Quarry
Gravel Pit
Sewage Disposal
Standpipe
Slag
Waste
LONG RIVER
EAST PENN
Blue Gap
Radio Tower
Beacon
TRAIL
MN
GN
10°
178 MILS
0°22'
7 MILS
UTM GRID AND 1970 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET
Scale 1:24,000
1000
0 Feet
USGS Map Central City, Ohio
Location Map
Central Processing Co.
Central City, Ohio
Hooperton 8.8 miles
40° 47' 30"
75° 37' 30"
Hamilton 9.4 miles

FIGURE 1-1

INFORMATION ONLY

MIXED WASTE STORAGE



REFERENCE DRAWINGS

B-7	ROAD & DRAINAGE AREA NORTH AREA UNITS 2 & 3
B-9	ROAD & DRAINAGE AREA SOUTH AREA UNITS 2 & 3
B-11	SANITARY SEWER SYSTEM ADDITION UNIT 2
B-850	ROAD & DRAINAGE PLAN NORTH AREA 2 UNITS 2 & 3
B-970	EXCAVATION PLAN OFFGAS FILTER BLDG UNITS 2 & 3
B-1126	SITE PLAN
B-1565	SITE PLAN FOR INVESTIGATION
B-1566 SH 1	SITE PLAN UNIT 2
B-1566 SH 2	SITE PLAN UNIT 3
B1-68	H.P.C.I. BUILDING SITE PLAN
B1-31	OFFGAS FILTER BUILDING SITE PLAN UNIT 1
RS-20D	SECURITY FENCE LAYOUT SHEET 1
M-193	OUTDOOR PIPING SHEET 1 UNITS 2 & 3
M-194	OUTDOOR PIPING SHEET 2 UNITS 2 & 3
M-195	OUTDOOR PIPING SHEET 3 UNITS 2 & 3
M-196	OUTDOOR PIPING SHEET 4 UNITS 2 & 3
M-197 SH 1	OUTDOOR PIPING SHEET 5 UNITS 2 & 3
M-197 SH 2	MAKE-UP DEMINERALIZER OUTDOOR PIPING PLAN S.W. AREA
M-197 SH 3	OUTDOOR PIPING FIRE HYDRANT RELOCATION
M-198	OUTDOOR PIPING SHEET 6 UNITS 2 & 3
M-199	OUTDOOR PIPING SHEET 7 UNITS 2 & 3
M-207	OUTDOOR PIPING SHEET 8 UNITS 2 & 3
M-208	OUTDOOR PIPING SHEET 9 UNITS 2 & 3
M-209	OUTDOOR PIPING SHEET 10 UNITS 2 & 3
M-211	OUTDOOR PIPING SHEET 11 UNITS 2 & 3

12E-1010	INTAKE STRUCTURE CONDUIT & TRAY LAYOUT SHEET 1 UNIT 1
12E-1107A	WASTEWATER TREATMENT FACILITIES SITE PLAN - UNDERGRND COND & GRNDING
12E-1182	ELECTRICAL DUCTRUN - OFFGAS FILTER BUILDING TO TURBINE BUILDING UNIT 1 PLAN
12E-1215	ELECTRICAL DUCTRUN HPCI BUILDING TO MAIN CONTROL ROOM UNIT 1
12E-1216	ELECTRICAL DUCTRUN HPCI BUILDING TO UNIT 2 TURBINE BUILDING
12E-1241B	CABLE ROUTING - OUTDOOR AREA NORTH AND SOUTH DUCTRUNS
12E-1513	OUTDOOR AREA RADWASTE IMPROVEMENTS DECANT FACILITIES
12E-2001	ELECTRICAL INSTALL - FIRE PROTECTION WAREHOUSE & OUTDOOR AREA
12E-2002	RELOCATION OF UNIT 1 DUCTRUN IN UNIT 2 AREA
12E-2003	DUCTRUNS OUTDOOR AREA - NORTH - PLANS & SECTIONS
12E-2010	CONSTRUCTION LAYOUT ELECTRICAL FACILITIES - PART 1
12E-2048	CABLE ROUTING AND FIRE STOPS OUTDOOR AREA & CABLE TUNNEL NORTH
12E-2074	ELECTRICAL INSTALLATION OUTDOOR AREA NORTH UNIT 2
12E-2074A	ELECTRICAL INSTALLATION OUTDOOR AREA NORTH UNIT 2
12E-2093	ELECTRICAL INSTALLATION OUTDOOR AREA NORTHWEST UNIT 2
12E-3074	ELECTRICAL INSTALLATION OUTDOOR AREA NORTH UNIT 3
12E-3183	DUCTRUNS OUTDOOR AREA NORTHEAST UNITS 2 & 3
12E-3184	DUCTRUNS OUTDOOR AREA NORTHWEST UNITS 2 & 3
12E-3185	DUCTRUNS OUTDOOR AREA SOUTHWEST UNITS 2 & 3
12E-3188	ADDITION TO UNIT 1 DUCTRUN 138 KV S.W.Y.D. PLANS AND SECTIONS
12E-6000	OFFGAS SYSTEM ELECTRICAL DUCTRUNS PLANS AND SECTIONS UNITS 2 & 3
12E-6001	ELECTRICAL CONCRETE DUCTRUNS PLAN SECTIONS & DETAILS OFFGAS FILTER BUILDING UNITS 2 & 3
12E-6760-A	MAKE-UP DEMINERALIZER OUTDOOR CONDUIT PLAN & SECTIONS S.W. AREA PART #1
12E-6760-B	MAKE-UP DEMINERALIZER OUTDOOR CONDUIT PLAN & SECTIONS S.W. AREA PART #2
124F 929	SANITARY SEWER SYSTEM GENERAL LAYOUT
124F 933	SANITARY SEWER SYSTEM PLAN - PLANT AREA
124F 942	UNDERGROUND PIPING SYSTEMS SOUTHWEST AREA PLAN UNIT 1
124F 943	UNDERGROUND PIPING SYSTEMS SOUTHEAST AREA PLAN UNIT 1
124F 944	UNDERGROUND PIPING SYSTEMS EAST CENTRAL AREA PLAN UNIT 1
124F 945	UNDERGROUND PIPING SYSTEMS WEST CENTRAL AREA PLAN UNIT 1
124F 946	UNDERGROUND PIPING SYSTEM NORTHWEST AREA PLAN UNIT 1
124F 947	UNDERGROUND PIPING SYSTEM NORTHEAST AREA PLAN UNIT 1
124F 948	UNDERGROUND PIPING SYSTEM WEST CENTRAL AREA PART 1 SECT. & DET.
124F 951	UNDERGROUND PIPING SYSTEM SOUTHEAST AND EAST CENTRAL SECTIONS & DETAILS
124F 952	UNDERGROUND PIPING SYSTEM EAST CENTRAL SECTIONS & DETAILS
124F 953	UNDERGROUND PIPING SYSTEM WEST CENTRAL & SOUTHWEST SECT. & DET.
124F 954	UNDERGROUND PIPING SYSTEM WEST CENTRAL AREA PART 2 SECT. & DET.
124F 955	UNDERGROUND PIPING SYSTEM NORTHWEST AND NORTHEAST SECTIONS & DETAILS
124F 966	STORM DRAINAGE SYSTEM PLAN
124F 975	CIRCULATING WATER SYSTEM PIPING PLAN AND PROFILE

LEGEND OF UNDERGROUND SYSTEMS

- STORM SEWERS
- SANITARY LINES
- FIRE PROTECTION
- MECHANICAL PIPING
- ELECTRICAL DUCT RUNS

FOR GROUNDING & CATHODIC PROTECTION NOT SHOWN SEE THE FOLLOWING DWGS:

12E-99	GROUNDING
12E-3009	GROUNDING
12E-100A	CATHODIC PROTECTION
12E-100B	CATHODIC PROTECTION

NOTE:
THIS DRAWING IS TO BE USED FOR SITE PLANNING. THE REFERENCE DRAWINGS LISTED WERE USED TO COMPILE THE INFORMATION ON THIS DRAWING.

DRAWING RELEASE RECORD

REV.	DATE REL'D.	PREPARED	REVIEWED	APPROVED	PURPOSE	FILM

DRAWING RELEASE RECORD

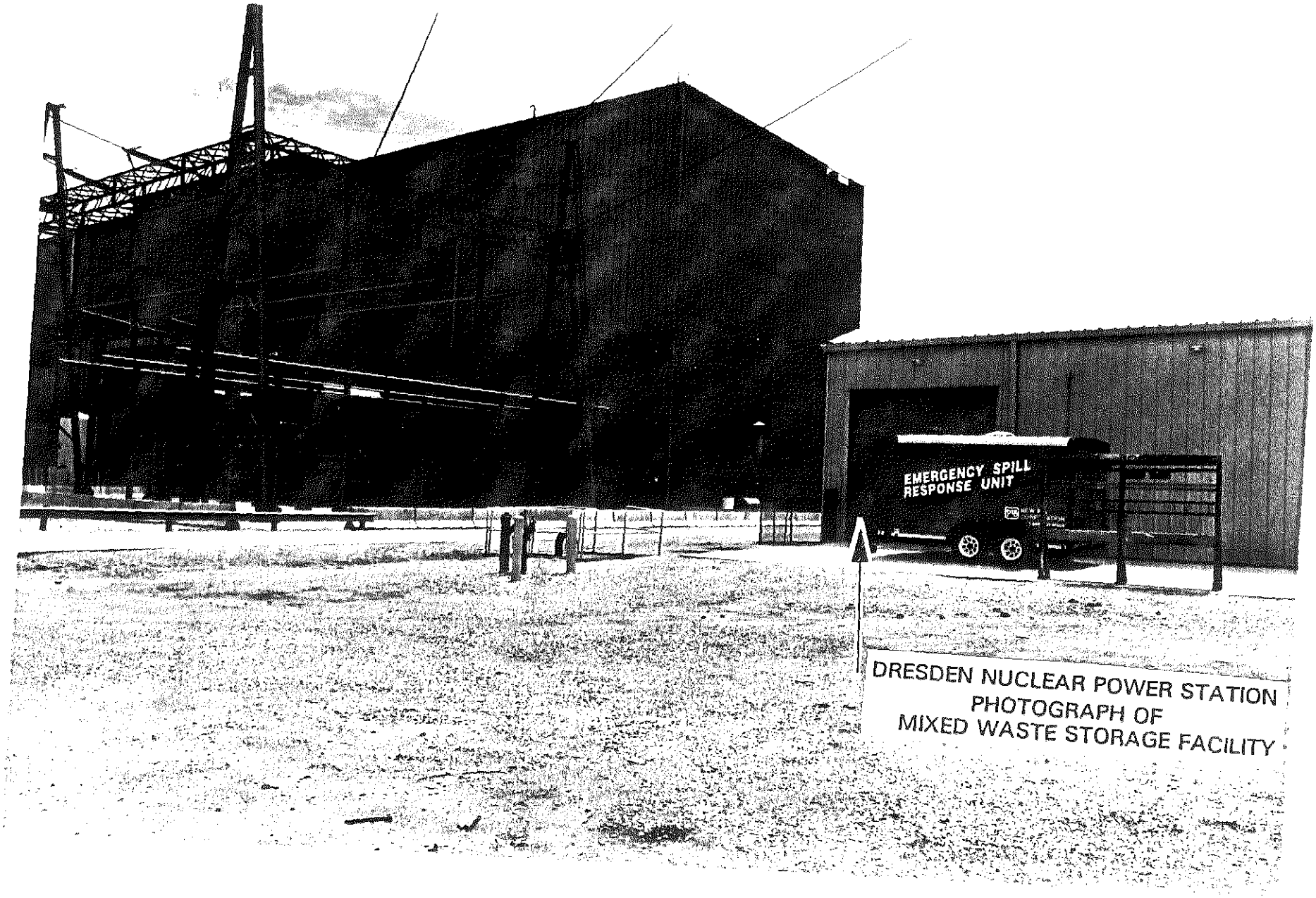
REV.	DATE REL'D.	PREPARED	REVIEWED	APPROVED	PURPOSE	FILM
A	11-2-88				FOR INFORMATION	

SCALE 1"=80'-0"
PROJECT NUMBER 8317-03

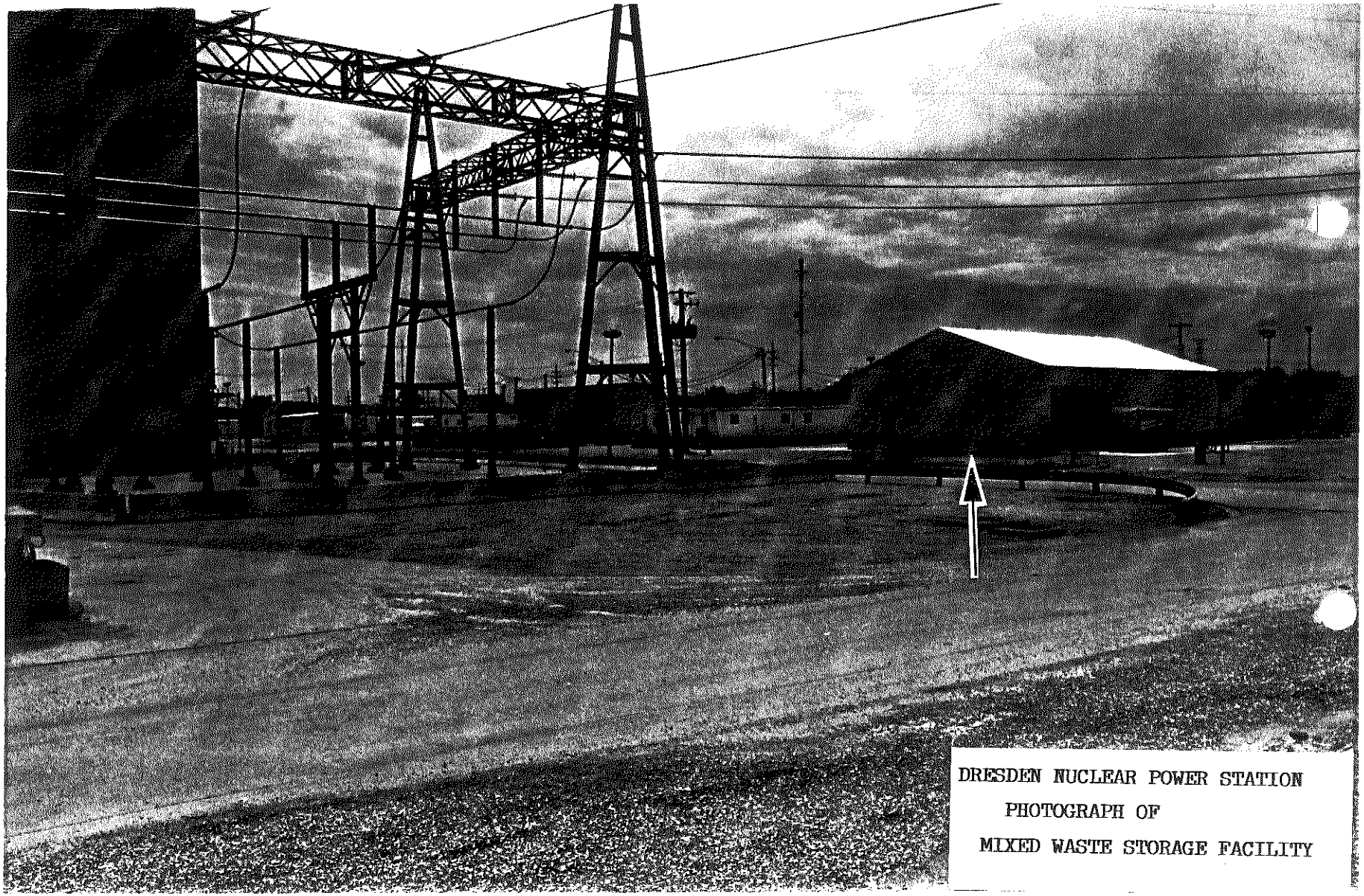
COMPOSITE SITE PLAN
DRESDEN STATION UNITS 1,2&3
COMMONWEALTH EDISON CO.
CHICAGO, ILLINOIS

SARGENT & LUNDY ENGINEERS CHICAGO

DRAWING NO. B-01A REV. A
SHEET OF



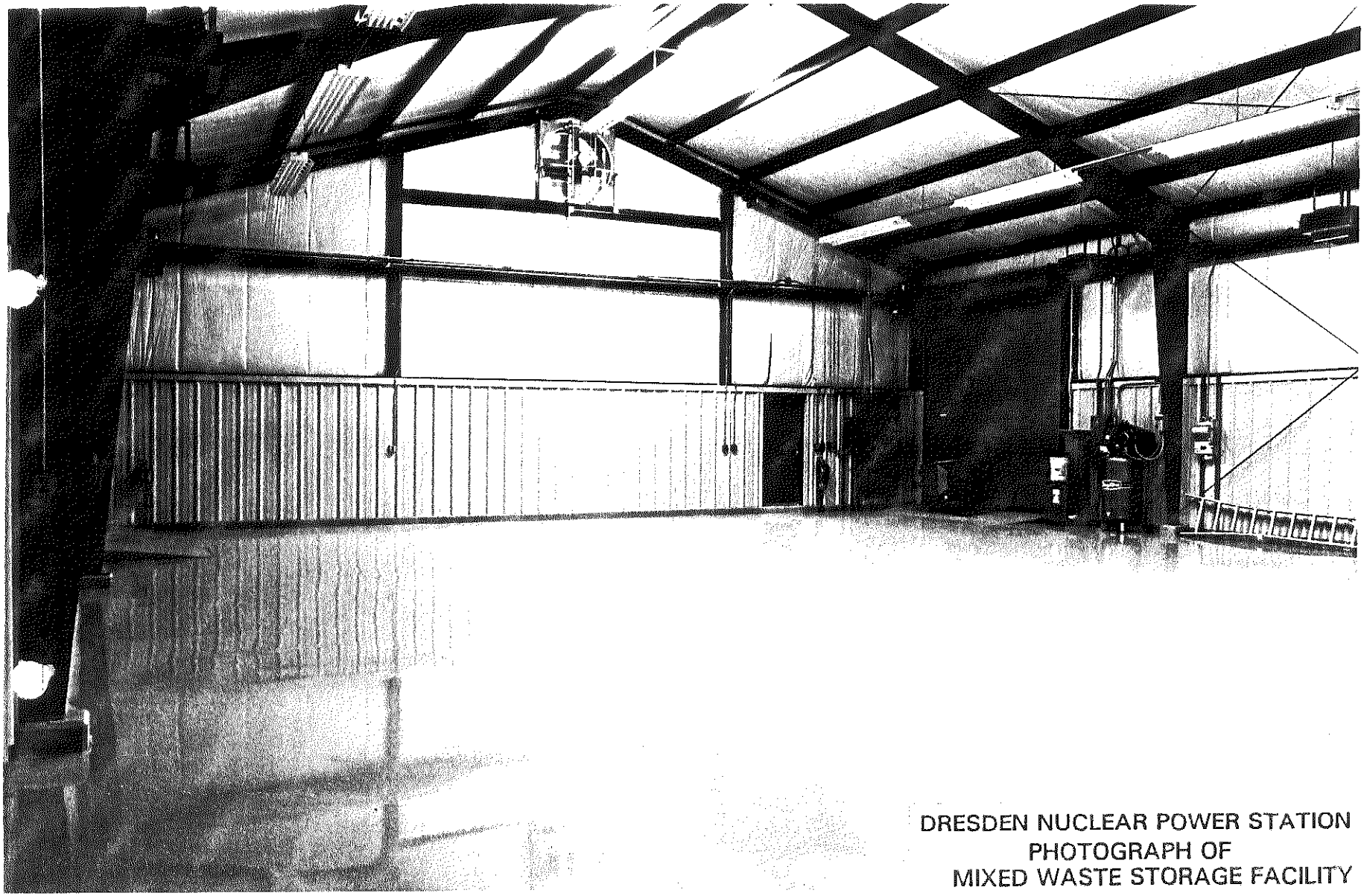
DRESDEN NUCLEAR POWER STATION
PHOTOGRAPH OF
MIXED WASTE STORAGE FACILITY



DRESDEN NUCLEAR POWER STATION

PHOTOGRAPH OF

MIXED WASTE STORAGE FACILITY



DRESDEN NUCLEAR POWER STATION
PHOTOGRAPH OF
MIXED WASTE STORAGE FACILITY

Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

October 31, 1990

HAND DELIVERED

George Hamper
Chief, Il RCRA Section
Mail Code 58R-13
U. S. Environmental Protection Agency, Region V
Post Office Box 7861
230 South Dearborn
Chicago, Illinois 60604

RECEIVED
OCT 31 1990
U. S. EPA, REGION V
SWB — PMS

Subject: Part A of the RCRA Permit Application
for the Mixed Waste Storage Units
at Commonwealth Edison Company
Nuclear Power Stations

Dear Mr. Hamper:

Low-level radioactive waste which is also a "hazardous" waste as defined by the Resource Conservation and Recovery Act (RCRA) is considered "mixed waste". Currently, no permitted waste disposal site accepts mixed waste. Therefore, mixed waste which has been generated by Commonwealth Edison's six nuclear power stations must be stored on site until an off-site disposal facility becomes available. Storing mixed waste on site for longer than 90 days will subject these stations to the interim status storage requirements of 35 IAC 725 (40 CFR 265).

In accordance with the RCRA interim status requirements, Commonwealth Edison Company hereby submits a copy of Part A of the RCRA permit application for each of the facilities listed below:

- Braidwood Nuclear Power Station ILD000806505 ✓
- Byron Nuclear Power Station ILD000806521 ✓
- Dresden Nuclear Power Station ILD000665489 ✓
- LaSalle County Nuclear Power Station ILD000803643 ✓
- Quad Cities Nuclear Power Station ILD060862810 ✓
- Zion Nuclear Power Station ILD010217156 ✓ delete 303

Should you have any questions concerning the information provided, please contact Judy Freitag at 312/294-3016.

Sincerely,

Thomas E. Hemminger
Environmental Services Manager

9144e
JAF:TEH:ssp

cc: J. A. Freitag
B. M. McCann

ILLINOIS POWER
500 SOUTH 27TH STREET, P.O. BOX 511, DECATUR, ILLINOIS 62525-1805

0-600957
L62-90(10-29)LP
1A.110

October 29, 1990

Certified Letter

Mr. George Hamper
Chief
Illinois RCRA Permit Unit
United States Environmental Protection Agency
Mail Code 5HR-13
230 South Dearborn
Chicago, Illinois 60604

RECEIVED
OCT 31 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA REGION V

Dear Mr. Hamper:

Re: Clinton Power Station
Part A Application for Hazardous Waste Permit

In accordance with 35 Illinois Administrative Code Subtitle G: Waste Disposal, Chapter I Pollution Control Board, Subchapter c: Hazardous Waste Requirements, Part 725 Interim Status Standards For Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, Illinois Power Company is submitting an "Application for a Hazardous Waste Permit" for a mixed waste drum storage unit located at the Clinton Power Station in Clinton, Illinois. Enclosed find a copy of the application for your review. Two copies of the application have also been submitted to Mr. Larry Eastep, IEPA-Division of Land Pollution Control.

Also enclosed is the final assurance documentation required for facilities operating under the Interim Status Standards.

Questions or comments regarding this matter should be directed to Lori Cusack at 217/424-7375 or me at 217/424-7087.

Sincerely,

ILLINOIS POWER COMPANY

Bob Thomas

Bob C. Thomas
Supervisor - Waste
Management

HAMPER.RCT:cls

DRESDEN NUCLEAR POWER STATION
Mixed Waste Storage Facility

Resource Conservation and Recovery Act

INTERIM STATUS PERMIT APPLICATION

Submitted

to the

Illinois Environmental Protection Agency

on

November 1, 1990

RECEIVED
NOV 0 1 1990
U. S. EPA, REGION V
SWB — FMS

prepared by

Commonwealth Edison Company
Environmental Services Department
P.O. BOX 767, CHICAGO ILLINOIS 60690-0767

TABLE OF CONTENTS

9136e

United States
Environmental Protection
Agency

Office of Water and
Hazardous Waste
Washington, DC 0

EPA Forms 3510-1 and 3510-3
June 1980

Solid Waste

EPA

Application for a Hazardous Waste Permit

Consolidated Permits Program

This package contains Part A of the application for an EPA hazardous waste permit.

Printed on Recycled Paper

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D C 20460

JUNE 13, 1980

THE ADMINISTRATOR

Enclosed are the application forms and instructions for a Federal permit to treat, store, or dispose of hazardous waste.

The Resource Conservation and Recovery Act (RCRA) requires anyone who owns or operates a facility where hazardous waste is treated, stored, or disposed to have a permit. RCRA establishes a procedure for obtaining interim status which allows existing facilities to continue operating until a final hazardous waste permit is issued. In order to obtain interim status, existing facilities must complete a two step process. The first step is the submittal of a Notification of Hazardous Waste Activity form. Copies of this form were mailed in mid-June. You probably already have a form and are reminded that it must be submitted by August 18, 1980. If you need a form, please contact the EPA Regional Office which serves your area. The second step is to submit the permit application forms included in this package by November 19, 1980. If you do not file a notification form and complete the permit application on time, you will be required by law to halt your operations until a permit is issued.

EPA is identifying hazardous waste in several stages. The first set of hazardous waste was identified and listed in regulations published in the May 19, 1980 Federal Register. Applications covering these wastes are due by November 19, 1980. In June, EPA will publish an additional set of hazardous wastes; a list of these wastes was included in the May 19 Federal Register and in the instruction package for the Notification of Hazardous Waste Activity form. Applications covering these wastes are required in December. If you treat, store, or dispose of wastes included in this second set of hazardous wastes you are encouraged to include those hazardous wastes in the application which is due by November 19, in order to eliminate the need for filing two separate permit applications.

Copies of the EPA regulations which were published on May 19 may be obtained by contacting:

Mr. Ed Cox
Solid Waste Publications
26 W. St. Claire Street
Cincinnati, Ohio 45268
(513) 684-5362

There are two parts to a RCRA permit application - Part A and Part B. Part A consists of Form 1 and Form 3 of EPA's Consolidated Permit Application. These forms are contained in this package and must be submitted by November 19, 1980.

Part B of the RCRA permit application contains detailed, site-specific information. The Part B information requirements have not yet been fully developed. We expect to publish the full set of Part B information requirements next October or November. Part B of the permit application will not have to be submitted until it is requested by EPA. You will then have up to six months to submit that part of the application. Given the large number of existing treatment, storage, and disposal facilities, we expect it will take at least several years before all Part B's will be requested.

Owners and operators of existing hazardous waste treatment, storage, and disposal facilities who file both their notification and Part A of their permit application on time will be sent an acknowledgement that EPA has received these documents. The acknowledgement will include the facility's EPA Identification Number. This number must be used on shipping manifests for transporting hazardous waste, on Annual Reports, and on all other correspondence with EPA.

Because thousands of persons will be filing permit applications, it will take four to eight weeks for the Agency to issue acknowledgements. If you do not receive an acknowledgement within eight weeks after your application is submitted, you should contact the appropriate EPA Regional Permit Contact listed in the enclosed instruction sheets entitled "How To Apply for a RCRA Permit."

Several State governments have permit requirements similar to EPA's. Even if you have a State hazardous waste permit you must file a RCRA permit application with EPA if you own or operate a facility where hazardous waste is treated, stored, or disposed.

The enclosed instruction sheets show the specific steps on how to apply for a RCRA permit. If after reading the instructions you have any questions regarding the permit application process, please contact the EPA Regional Permit Contact in your area for assistance.

Sincerely yours,

Douglas M. Costle

Enclosures

Who Must File a RCRA Permit Application

The Resource Conservation and Recovery Act of 1976 *(RCRA)* requires each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste to have a permit. This includes individuals, trusts, firms, joint stock companies, corporations *(including government corporations)*, partnerships, associations, States, municipalities, commissions, interstate bodies and Federal Agencies. If you treat, store, or dispose of hazardous waste without obtaining a permit, you may be subject to civil or criminal penalty.

How to Determine if you Handle Hazardous Waste

OFF–SITE FACILITIES. Owners and operators of off–site treatment, storage, or disposal facilities are encouraged to obtain waste information from the generators they serve. If the generators will not supply this information, you are still responsible for determining if you handle a hazardous waste and should follow the procedures below for on–site facilities.

ON–SITE FACILITIES. Solid waste generators who treat, store, or dispose of their own waste on–site should follow the following procedures for determining if their waste is a hazardous waste. This determination is made as follows:

A. First, determine if the solid waste handled is excluded from regulation as a hazardous waste. The list of exclusions can be found in the regulation titled "Identification and Listing of Hazardous Waste", Sections 261.4 and 261.5 published in the "Federal Register," May 19, 1980. If the solid waste handled is excluded, a RCRA hazardous waste permit is not needed to treat, store, or dispose of these wastes.

B. If the solid waste handled is not excluded by Sections 261.4 or 261.5, determine if the waste is listed in Subpart D of "Identification and Listing of Hazardous Waste." Persons owning or operating facilities where listed hazardous waste is treated, stored, or disposed are subject to regulation and must file a RCRA permit application.

C. If the waste handled is not listed in Subpart D of "Identification and Listing of Hazardous Waste," the waste may still be hazardous because it possesses certain characteristics or contains certain contaminants. These characteristics and contaminants are contained in Subpart C of "Identification and Listing of Hazardous Waste." A determination that a waste possesses these characteristics or contaminants may be made either based on: (1) Your knowledge of the hazard characteristic of the waste in light of the materials or the processes used; or (2) The results of testing the waste according to the methods in Subpart C of "Identification and Listing of Hazardous Waste."

Certain persons who handle hazardous waste are not required to obtain a RCRA permit. They are:

Generators who accumulate their own hazardous waste on–site for less than 90 days as provided in 40 CFR 262.34;

Farmers who dispose of hazardous waste pesticide from their own use as provided in 40 CFR 262.51; and

Owners and operators of totally enclosed treatment facilities as defined in 40 CFR 260.10.

What Information Should be Filed and When

There are two parts to the RCRA permit application – Part A and Part B. Part A consists of Form 1 and Form 3 of EPA's Consolidated Permit Application. Part B requires detailed site–specific information such as geologic, hydrologic, and engineering data. 40 CFR 122.25 specifies the information that will be required from hazardous waste management facilities in Part B.

RCRA established a procedure for obtaining "interim status" which allows existing hazardous waste management facilities to continue their operations until a final hazardous waste permit is issued. In order to qualify for interim status, owners and operators of existing hazardous waste management facilities must complete and sign both Forms 1 and 3 and submit them to EPA by November 19, 1980. In order for an existing facility to receive a permit, a complete Part B must be submitted within six months after it is requested by EPA. For new facilities, both Part A and Part B must be submitted to EPA at least 180 days before physical construction is expected to commence.

Operation During Interim Status

As provided in 40 CFR 122.23(b), Part A of the permit application defines the processes to be used for treatment, storage, and disposal of hazardous wastes; the design capacity of such processes; and the specific hazardous wastes to be handled at a facility during the interim status period. Once Part A is submitted to EPA, changes in the hazardous wastes handled, changes in design of facilities, changes in processes, and changes in ownership or operational control at a facility during the interim status period may only be made in accordance with the procedures in 40 CFR 122.23(c). Changes in design capacity and changes in processes require prior EPA approval. Changes in the quantity of waste handled at a facility during interim status can be made without submitting a revised Part A provided the quantity does not exceed the design capacities of the processes specified in Part A of the permit application. Failure to furnish all information required to process a permit application is grounds for termination of interim status.

How Many Applications Should be Filed

You need submit only one RCRA permit application *(Part A and Part B)* per site or location, provided that you describe all of the activities at that site or location. If you conduct hazardous waste activity*(ies)* at more than one site or location, you must submit a separate application for each site or location.

Where to File

Permit applications should be sent to the EPA Regional office that serves the area where your hazardous waste management facility is located. If you previously received a notification packet from EPA that contains two preaddressed mailing labels and two envelopes, you should use one of the mailing labels and one of the envelopes to send your permit application to EPA. If you do not have a preaddressed mailing label, mail your permit application to the EPA Regional office that serves the area where your hazardous waste management facility is located. The mailing addresses for the EPA Regional offices are listed on the following page.

REGIONAL MAILING ADDRESSES AND PERMIT CONTACTS UP TO NOVEMBER 19, 1980

EPA REGION	AREA SERVED	PERMIT APPLICATION MAILING ADDRESSES[1]	EPA REGIONAL HAZARDOUS WASTE PERMIT CONTACTS[2]
I	Connecticut, Maine Massachusetts, Rhode Island, Vermont, New Hampshire	EPA Region I Permits Branch P.O. Box 8748 Boston, MA 02114	Rich Cavagnero (617) 223–0240
II	New Jersey, New York, Virgin Islands, Puerto Rico	EPA Region II Information Service Center 26 Federal Plaza New York, NY 10007	Harry Ruisi (212) 264–0503
III	Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia	EPA Region III P.O. Box 1480 Philadelphia, PA 19107	Shirley Bulkin (215) 597–8751
IV	Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee	EPA Region IV RCRA Activities 345 Courtland, N.E. [illegible]	Ray Cozart (404) 881–3446
V	Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin	[illegible]	[illegible] *, MI, MN,*
VI	Arkansas, Louisiana, New Mexico, Oklahoma, Texas	[illegible] 1201 Elm Street First International Bldg. Dallas, TX 75270	
VII	Iowa, Kansas, Missouri, Nebraska	EPA Region VII P.O. Box 15606 Kansas City, MO 64106	Dennis Degner (800) 892–3837 *(MO)* (800) 821–3714 *(IA, KS, NE)*
VIII	Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming	EPA Region VIII 8AH–WM (ON) 1860 Lincoln Street Denver, CO 80295	Jim Rakers (303) 837–2221 (800) 332–3321 *(CO)* (800) 525–3022 *(MT, ND, SD, UT, WY)*
IX	Arizona, California, Hawaii, Nevada, Guam, American Samoa, Commonwealth of the Northern Marianas	EPA Region IX Attn: A–3–2 215 Fremont Street San Francisco, CA 94105	Bill Wilson (415) 556–1407
X	Alaska, Idaho, Oregon, Washington	EPA Region X M/S 530–A 1200 Sixth Avenue Seattle, WA 98101	Betty Wiese (206) 442–1260 (800) 542–0841 *(WA)* (800) 426–0663 *(AL, ID, OR)*

[1] These mailing addresses should be used for all applications filed by November 19, 1980. After November 19, all applications should be mailed to the addresses listed in Table 1 in the instructions to Form 1 which are enclosed in this packet.

[2] These persons should be contacted if you need assistance in applying for a RCRA Hazardous Waste Permit up to November 19, 1980. After November 19, contact the persons listed in Table 1 in the instructions to Form 1 which are enclosed in this packet.

United States
Environmental Protection
Agency

Office of
Enforcement
Washington, DC 20460

EPA Form 3510-1
June 1980

Permits Division

EPA

Application Form 1 - General Information

Consolidated Permits Program

This form must be completed by all persons applying for a permit under EPA's Consolidated Permits Program. See the general instructions to Form 1 to determine which other application forms you will need.

DESCRIPTION OF CONSOLIDATED PERMIT APPLICATION FORMS

The Consolidated Permit Application Forms are:

Form 1 – General Information *(included in this part)*;

Form 2 – Discharges to Surface Water *(NPDES Permits)*:

2A. Publicly Owned Treatment Works *(Reserved – not included in this package)*,

2B. Concentrated Animal Feeding Operations and Aquatic Animal Production Facilities *(not included in this package)*,

2C. Existing Manufacturing, Commercial, Mining, and Silvicultural Operations *(not included in this package)*, and

2D. New Manufacturing, Commercial, Mining, and Silvicultural Operations *(Reserved – not included in this package)*;

Form 3 – Hazardous Waste Application Form *(RCRA Permits – included in Part 2 of this package)*;

Form 4 – Underground Injection of Fluids *(UIC Permits – Reserved – not included in this package)*; and

Form 5 – Air Emissions in Attainment Areas *(PSD Permits – Reserved – not included in this package)*.

FORM 1 PACKAGE TABLE OF CONTENTS

SECTION A – GENERAL INSTRUCTIONS

Who Must Apply

With the exceptions described in Section C of these instructions, Federal laws prohibit you from conducting any of the following activities without a permit.

NPDES *(National Pollutant Discharge Elimination System Under the Clean Water Act, 33 U.S.C. 1251)*. Discharge of pollutants into the waters of the United States.

RCRA *(Resource Conservation and Recovery Act, 42 U.S.C. 6901)*. Treatment, storage, or disposal of hazardous wastes.

UIC *(Underground Injection Control Under the Safe Drinking Water Act, 42 U.S.C. 300f)*. Injection of fluids underground by gravity flow or pumping.

PSD *(Prevention of Significant Deterioration Under the Clean Air Act, 72 U.S.C. 7401)*. Emission of an air pollutant by a new or modified facility in or near an area which has attained the National Ambient Air Quality Standards for that pollutant.

Each of the above permit programs is operated in any particular State by either the United States Environmental Protection Agency *(EPA)* or by an approved State agency. You must use this application form to apply for a permit for those programs administered by EPA. For those programs administered by approved States, contact the State environmental agency for the proper forms.

If you have any questions about whether you need a permit under any of the above programs, or if you need information as to whether a particular program is administered by EPA or a State agency, or if you need to obtain application forms, contact your EPA Regional office *(listed in Table 1)*.

Upon your request, and based upon information supplied by you, EPA will determine whether you are required to obtain a permit for a particular facility. Be sure to contact EPA if you have a question, because Federal laws provide that you may be heavily penalized if you do not apply for a permit when a permit is required.

Form 1 of the EPA consolidated application forms collects general information applying to all programs. You must fill out Form 1 regardless of which permit you are applying for. In addition, you must fill out one of the supplementary forms *(Forms 2 – 5)* for each permit needed under each of the above programs. Item II of Form 1 will guide you to the appropriate supplementary forms.

You should note that there are certain exclusions to the permit requirements listed above. The exclusions are described in detail in Section C of these instructions. If your activities are excluded from permit requirements then you do not need to complete and return any forms.

NOTE: Certain activities not listed above also are subject to EPA administered environmental permit requirements. These include permits for ocean dumping, dredged or fill material discharging, and certain types of air emissions. Contact your EPA Regional office for further information.

Table 1. Addresses of EPA Regional Contacts and States Within the Regional Office Jurisdictions

REGION I

Permit Contact, Environmental and Economic Impact Office, U.S. Environmental Protection Agency, John F. Kennedy Building, Boston, Massachusetts 02203, (617) 223–4635, FTS 223–4635.
Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont.

REGION II

Permit Contact, Permits Administration Branch, Room 432, U.S. Environmental Protection Agency, 26 Federal Plaza, New York, New York 10007, (212) 264–9880, FTS 264–9880.
New Jersey, New York, Virgin Islands, and Puerto Rico.

REGION III

Permit Contact *(3 EN 23)*, U.S. Environmental Protection Agency, 6th & Walnut Streets, Philadelphia, Pennsylvania 19106, (215) 597–8816, FTS 597–8816.
Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, and West Virginia.

REGION IV

Permit Contact, Permits Section, U.S. Environmental Protection Agency, 345 Courtland Street, N.E., Atlanta, Georgia 30365, (404) 881–2017, FTS 257–2017.
Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee.

REGION V

Permit Contact *(5EP)*, U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, (312) 353–2105, FTS 353–2105.
Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin.

Table 1 *(continued)*

REGION VI

Permit Contact *(6AEP)*, U.S. Environmental Protection Agency, First International Building, 1201 Elm Street, Dallas, Texas 75270, (214) 767–2765, FTS 729–2765.
Arkansas, Louisiana, New Mexico, Oklahoma, and Texas.

REGION VII

Permit Contact, Permits Branch, U.S. Environmental Protection Agency, 324 East 11th Street, Kansas City, Missouri 64106, (816) 758–5955, FTS 758–5955.
Iowa, Kansas, Missouri, and Nebraska.

REGION VIII

Permit Contact *(8E–WE)*, Suite 103, U.S. Environmental Protection Agency, 1816 Lincoln Street, Denver, Colorado 80203, (303) 837–4901, FTS 837–4901.
Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming.

REGION IX

Permit Contact, Permits Branch *(E–4)*, U.S. Environmental Protection Agency, 215 Fremont Street, San Francisco, California 94105, (415) 556–3450, FTS 556–3450.
Arizona, California, Hawaii, Nevada, Guam, American Samoa, and Trust Territories.

REGION X

Permit Contact *(M/S 521)*, U.S. Environmental Protection Agency, 1200 6th Avenue, Seattle, Washington 98101, (206) 442–7178, FTS 399–7178.
Alaska, Idaho, Oregon, and Washington.

Where to File

The application forms should be mailed to the EPA Regional office whose Region includes the State in which the facility is located *(see Table 1)*.

If the State in which the facility is located administers a Federal permit program under which you need a permit, you should contact the appropriate State agency for the correct forms. Your EPA Regional office *(Table 1)* can tell you to whom to apply and can provide the appropriate address and phone number.

When to File

Because of statutory requirements, the deadlines for filing applications vary according to the type of facility you operate and the type of permit you need. These deadlines are as follows:[1]

Table 2. Filing Dates for Permits

FORM *(permit)*	WHEN TO FILE
2A *(NPDES)*	180 days before your present NPDES permit expires.
2B *(NPDES)*	180 days before your present NPDES permit expires[4], or 180 days prior to start-up if you are a new facility.
2C *(NPDES)*	180 days before your present NPDES permit expires[2].
2D *(NPDES)*	180 days prior to startup.
3 *(Hazardous Waste)*	Existing facility: Six months following publication of regulations listing hazardous wastes. New facility: 180 days before commencing physical construction.

Table 2 *(continued)*

4 *(UIC)*	A reasonable time prior to construction for new wells; as directed by the Director for existing wells.
5 *(PSD)*	Prior to commencement of construction.

[1] Please note that some of these forms are not yet available for use and are listed as "Reserved" at the beginning of these instructions. Contact your EPA Regional office for information on current application requirements and forms.

[2] If your present permit expires on or before November 30, 1980, the filing date is the date on which your permit expires. If your permit expires during the period December 1, 1980 – May 31, 1981, the filing date is 90 days before your permit expires.

Federal regulations provide that you may not begin to construct a new source in the NPDES program, a new hazardous waste management facility, a new injection well, or a facility covered by the PSD program before the issuance of a permit under the applicable program. Please note that if you are required to obtain a permit before beginning construction, as described above, you may need to submit your permit application well in advance of an applicable deadline listed in Table 2.

Fees

The U.S. EPA does not require a fee for applying for any permit under the consolidated permit programs. *(However, some States which administer one or more of these programs require fees for the permits which they issue.)*

Availability of Information to Public

Information contained in these application forms will, upon request, be made available to the public for inspection and copying. However, you may request confidential treatment for certain information which you submit on certain supplementary forms. The specific instructions for each supplementary form state what information on the form, if any, may be claimed as confidential and what procedures govern the claim. No information on Forms 1 and 2A through 2D may be claimed as confidential.

Completion of Forms

Unless otherwise specified in instructions to the forms, each item in each form must be answered. To indicate that each item has been considered, enter "NA," for not applicable, if a particular item does not fit the circumstances or characteristics of your facility or activity.

If you have previously submitted information to EPA or to an approved State agency which answers a question, you may either repeat the information in the space provided or attach a copy of the previous submission. Some items in the form require narrative explanation. If more space is necessary to answer a question, attach a separate sheet entitled "Additional Information."

Financial Assistance for Pollution Control

There are a number of direct loans, loan guarantees, and grants available to firms and communities for pollution control expenditures. These are provided by the Small Business Administration, the Economic Development Administration, the Farmers Home Administration, and the Department of Housing and Urban Development. Each EPA Regional office *(Table 1)* has an economic assistance coordinator who can provide you with additional information.

EPA's construction grants program under Title II of the Clean Water Act is an additional source of assistance to publicly owned treatment works. Contact your EPA Regional office for details.

This form must be completed by all applicants.

Completing This Form

Please type or print in the unshaded areas only. Some items have small graduation marks in the fill-in spaces. These marks indicate the number of characters that may be entered into our data system. The marks are spaced at 1/6" intervals which accommodate elite type *(12 characters per inch)*. If you use another type you may ignore the marks. If you print, place each character between the marks. Abbreviate if necessary to stay within the number of characters allowed for each item. Use one space for breaks between words, but not for punctuation marks unless they are needed to clarify your response.

Item I

Space is provided at the upper right hand corner of Form 1 for insertion of your EPA Identification Number. If you have an existing facility, enter your Identification Number. If you don't know your EPA Identification Number, please contact your EPA Regional office *(Table 1)*, which will provide you with your number. If your facility is new *(not yet constructed)*, leave this item blank.

Item II

Answer each question to determine which supplementary forms you need to fill out. Be sure to check the glossary in Section D of these instructions for the legal definitions of the **bold faced words**. Check Section C of these instructions to determine whether your activity is excluded from permit requirements.

If you answer "no" to every question, then you do not need a permit, and you do not need to complete and return any of these forms.

If you answer "yes" to any question, then you must complete and file the supplementary form by the deadline listed in Table 2 along with this form. *(The applicable form number follows each question and is enclosed in parentheses.)* You need not submit a supplementary form if you already have a permit under the appropriate Federal program, unless your permit is due to expire and you wish to renew your permit.

Questions (I) and (J) of Item II refer to major new or modified sources subject to Prevention of Significant Deterioration *(PSD)* requirements under the Clean Air Act. For the purpose of the PSD program, major sources are defined as: (A) Sources listed in Table 3 which have the potential to emit 100 tons or more per year emissions; and (B) All other sources with the potential to emit 250 tons or more per year. See Section C of these instructions for discussion of exclusions of certain modified sources.

Table 3. 28 Industrial Categories Listed in Section 169(1) of the Clean Air Act of 1977

Fossil fuel-fired steam generators of more than 250 million BTU per hour heat input;
Coal cleaning plants *(with thermal dryers)*;
Kraft pulp mills;
Portland cement plants;
Primary zinc smelters;
Iron and steel mill plants;
Primary aluminum ore reduction plants;
Primary copper smelters;
Municipal incinerators capable of charging more than 250 tons of refuse per day;
Hydrofluoric acid plants;
Nitric acid plants;
Sulfuric acid plants;
Petroleum refineries;
Lime plants;
Phosphate rock processing plants;
Coke oven batteries;
Sulfur recovery plants;
Carbon black plants *(furnace process)*;
Primary lead smelters;
Fuel conversion plants;
Sintering plants;
Secondary metal production plants;
Chemical process plants;
Fossil fuel boilers *(or combination thereof)* totaling more than 250 million BTU per hour heat input;

Table 3 (continued)

Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels;
Taconite ore processing plants;
Glass fiber processing plants; and
Charcoal production plants.

Item III

Enter the facility's official or legal name. Do not use a colloquial name.

Item IV

Give the name, title, and work telephone number of a person who is thoroughly familiar with the operation of the facility and with the facts reported in this application and who can be contacted by reviewing offices if necessary.

Item V

Give the complete mailing address of the office where correspondence should be sent. This often is not the address used to designate the location of the facility or activity.

Item VI

Give the address or location of the facility identified in Item III of this form. If the facility lacks a street name or route number, give the most accurate alternative geographic information *(e.g., section number or quarter section number from county records or at intersection of Rts. 425 and 22)*.

Item VII

List, in descending order of significance, the four 4-digit standard industrial classification *(SIC)* codes which best describe your facility in terms of the principal products or services you produce or provide. Also, specify each classification in words. These classifications may differ from the SIC codes describing the operation generating the discharge, air emissions, or hazardous wastes.

SIC code numbers are descriptions which may be found in the "Standard Industrial Classification Manual" prepared by the Executive Office of the President, Office of Management and Budget, which is available from the Government Printing Office, Washington, D.C. Use the current edition of the manual. If you have any questions concerning the appropriate SIC code for your facility, contact your EPA Regional office *(see Table 1)*.

Item VIII-A

Give the name, as it is legally referred to, of the person, firm, public organization, or any other entity which operates the facility described in this application. This may or may not be the same name as the facility. The operator of the facility is the legal entity which controls the facility's operation rather than the plant or site manager. Do not use a colloquial name.

Item VIII-B

Indicate whether the entity which operates the facility also owns it by marking the appropriate box.

Item VIII-C

Enter the appropriate letter to indicate the legal status of the operator of the facility. Indicate "public" for a facility solely owned by local government*(s)* such as a city, town, county, parish, etc.

Items VIII-D - H

Enter the telephone number and address of the operator identified in Item VIII-A.

Item IX

Indicate whether the facility is located on Indian Lands.

Item X

Give the number of each presently effective permit issued to the facility for each program or, if you have previously filed an application but have not yet received a permit, give the number of the application, if any. Fill in the unshaded area only. If you have more than one currently effective permit for your facility under a particular permit program, you may list additional permit numbers on a separate sheet of paper. List any relevant environmental Federal *(e.g., permits under the Ocean Dumping Act, Section 404 of the Clean Water Act or the Surface Mining Control and Reclamation Act)*, State *(e.g., State permits for new air emission sources in nonattainment areas under Part D of the Clean Air Act or State permits under Section 404 of the Clean Water Act)*, or local permits or applications under "other."

Item XI

Provide a topographic map or maps of the area extending at least to one mile beyond the property boundaries of the facility which clearly show the following:

The legal boundaries of the facility;

The location and serial number of each of your existing and proposed intake and discharge structures;

All hazardous waste management facilities;

Each well where you inject fluids underground; and

All springs and surface water bodies in the area, plus all drinking water wells within 1/4 mile of the facility which are identified in the public record or otherwise known to you.

If an intake or discharge structure, hazardous waste disposal site, or injection well associated with the facility is located more than one mile from the plant, include it on the map, if possible. If not, attach additional sheets describing the location of the structure, disposal site, or well, and identify the U.S. Geological Survey *(or other)* map corresponding to the location.

On each map, include the map scale, a meridian arrow showing north, and latitude and longitude at the nearest whole second. On all maps of rivers, show the direction of the current, and in tidal waters, show the directions of the ebb and flow tides. Use a 7-1/2 minute series map published by the U.S. Geological Survey, which may be obtained through the U.S. Geological Survey Offices listed below. If a 7-1/2 minute series map has not been published for your facility site, then you may use a 15 minute series map from the U.S. Geological Survey. If neither a 7-1/2 nor 15 minute series map has been published for your facility site, use a plat map or other appropriate map, including all the requested information; in this case, briefly describe land uses in the map area *(e.g., residential, commercial)*.

You may trace your map from a geological survey chart, or other map meeting the above specifications. If you do, your map should bear a note showing the number or title of the map or chart it was traced from. Include the names of nearby towns, water bodies, and other prominent points. An example of an acceptable location map is shown in Figure 1—1 of these instructions. *(NOTE: Figure 1—1 is provided for purposes of illustration only, and does not represent any actual facility.)*

U.S.G.S. OFFICES	AREA SERVED
Eastern Mapping Center National Cartographic Information Center U.S.G.S. 536 National Center Reston, Va. 22092 Phone No. (703) 860—6336	Ala., Conn., Del., D.C., Fla., Ga., Ind., Ky., Maine, Md., Mass., N.H., N.J., N.Y., N.C., S.C., Ohio, Pa., Puerto Rico, R.I., Tenn., Vt., Va., W. Va., and Virgin Islands.
Mid Continent Mapping Center National Cartographic Information Center U.S.G.S. 1400 Independance Road Rolla, Mo. 65401 Phone No. (314) 341—0851	Ark., Ill., Iowa, Kans., La. Mich., Minn., Miss., Mo. N. Dak., Nebr., Okla., S. Dak., and Wis.
Rocky Mountain Mapping Center National Cartographic Infomation Center U.S.G.S. Stop 504, Box 25046 Federal Center Denver, Co. 80225 Phone No. (303) 234—2326	Alaska, Colo., Mont., N. Mex., Tex., Utah, and Wyo.
Western Mapping Center National Cartographic Information Center U.S.G.S. 345 Middlefield Road Menlo Park, Ca. 94025 Phone No. (415) 323—8111	Ariz., Calif., Hawaii, Idaho, Nev., Oreg., Wash., American Samoa, Guam, and Trust Territories

Item XI *(continued)*

Item XII

Briefly describe the nature of your business *(e.g., products produced or services provided)*.

Item XIII

Federal statues provide for severe penalties for submitting false information on this application form.

18 U.S.C. Section 1001 provides that "Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals or covers up by any trick, scheme, or device a material fact, or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statement or entry, shall be fined not more than $10,000 or imprisoned not more than five years, or both."

Section 309(c)(2) of the Clean Water Act and Section 113(c)(2) of the Clean Air Act each provide that "Any person who knowingly makes any false statement, representation, or certification in any application, . . . shall upon conviction, be punished by a fine of no more than $10,000 or by imprisonment for not more than six months, or both."

In addition, Section 3008(d)(3) of the Resource Conservation and Recovery Act provides for a fine up to $25,000 per day or imprisonment up to one year, or both, for a first conviction for making a false statement in any application under the Act, and for double these penalties upon subsequent convictions.

FEDERAL REGULATIONS REQUIRE THIS APPLICATION TO BE SIGNED AS FOLLOWS:

A. For a corporation, by a principal executive officer of at least the level of vice president. However, if the only activity in Item II which is marked "yes" is Question G, the officer may authorize a person having responsibility for the overall operations of the well or well field to sign the certification. In that case, the authorization must be written and submitted to the permitting authority.

B. For partnership or sole proprietorship, by a general partner or the proprietor, respectively; or

C. For a municipality, State, Federal, or other public facility, by either a principal executive officer or ranking elected official.

SECTION C – ACTIVITIES WHICH DO NOT REQUIRE PERMITS

I. National Pollutant Discharge Elimination System Permits Under the Clean Water Act. You are not required to obtain an NPDES permit if your discharge is in one of the following categories, as provided by the Clean Water Act *(CWA)* and by the NPDES regulations *(40 CFR Parts 122–125)*. However, under Section 510 of CWA a discharge exempted from the federal NPDES requirements may still be regulated by a State authority; contact your State environmental agency to determine whether you need a State permit.

A. DISCHARGES FROM VESSELS. Discharges of sewage from vessels, effluent from properly functioning marine engines, laundry, shower, and galley sink wastes, and any other discharge incidental to the normal operation of a vessel do not require NPDES permits. However, discharges of rubbish, trash, garbage, or other such materials discharged overboard require permits, and so do other discharges when the vessel is operating in a capacity other than as a means of transportation, such as when the vessel is being used as an energy or mining facility, a storage facility, or a seafood processing facility, or is secured to the bed of the ocean, contiguous zone, or waters of the United States for the purpose of mineral or oil exploration or development.

B. DREDGED OR FILL MATERIAL. Discharges of dredged or fill material into waters of the United States do not need NPDES permits if the dredging or filling is authorized by a permit issued by the U.S. Army Corps of Engineers or an EPA approved State under Section 404 of CWA.

C. DISCHARGES INTO PUBLICLY OWNED TREATMENT WORKS *(POTW)*. The introduction of sewage, industrial wastes, or other pollutants into a POTW does not need an NPDES permit. You must comply with all applicable pretreatment standards promulgated under Section 307(b) of CWA, which may be included in the permit issued to the POTW. If you have a plan or an agreement to switch to a POTW in the future, this does not relieve you of the obligation to apply for and receive an NPDES permit until you have stopped discharging pollutants into waters of the United States.

(NOTE: Dischargers into privately owned treatment works do not have to apply for or obtain NPDES permits except as otherwise required by the EPA Regional Administrator. The owner or operator of the treatment works itself, however, must apply for a permit and identify all users in its application. Users so identified will receive public notice of actions taken on the permit for the treatment works.)

D. DISCHARGES FROM AGRICULTURAL AND SILVICULTURAL ACTIVITIES. Most discharges from agricultural and silvicultural activities to waters of the United States do not require NPDES permits. These include runoff from orchards, cultivated crops, pastures, range lands, and forest lands. However, the discharges listed below do require NPDES permits. Definitions of the terms listed below are contained in the Glossary section of these instructions.

1. Discharges from Concentrated Animal Feeding Operations. *(See Glossary for definitions of "animal feeding operations" and "concentrated animal feeding operations." Only the latter require permits.)*

2. Discharges from Concentrated Aquatic Animal Production Facilities. *(See Glossary for size cutoffs.)*

3. Discharges associated with approved Aquaculture Projects.

4. Discharges from Silvicultural Point Sources. *(See Glossary for the definition of "silvicultural point source.")* Nonpoint source silvicultural activities are excluded from NPDES permit requirements. However, some of these activities, such as stream crossings for roads, may involve point source discharges of dredged or fill material which may require a Section 404 permit. See 33 CFR 209.120.

E. DISCHARGES IN COMPLIANCE WITH AN ON–SCENE COORDINATOR'S INSTRUCTIONS.

II. Hazardous Waste Permits Under the Resource Conservation and Recovery Act. You may be excluded from the requirement to obtain a permit under this program if you fall into one of the following categories:

Generators who accumulate their own hazardous waste on–site for less than 90 days as provided in 40 CFR 262.34;

Farmers who dispose of hazardous waste pesticide from their own use as provided in 40 CFR 262.51;

Certain persons treating, storing, or disposing of small quantities of hazardous waste as provided in 40 CFR 261.4 or 261.5; and

Owners and operators of totally enclosed treatment facilities as defined in 40 CFR 260.10.

Check with your Regional office for details. Please note that even if you are excluded from permit requirements, you may be required by Federal regulations to handle your waste in a particular manner.

III. Underground Injection Control Permits Under the Safe Drinking Water Act. You are not required to obtain a permit under this program if you:

Inject into existing wells used to enhance recovery of oil and gas or to store hydrocarbons *(note, however, that these underground injections are regulated by Federal rules)*; or

Inject into or above a stratum which contains, within 1/4 mile of the well bore, an underground source of drinking water *(unless your injection is the type identified in Item II-H, for which you do need a permit)*. However, you must notify EPA of your injection and submit certain required information on forms supplied by the Agency, and your operation may be phased out if you are a generator of hazardous wastes or a hazardous waste management facility which uses wells or septic tanks to dispose of hazardous waste.

IV. Prevention of Significant Deterioration Permits Under the Clean Air Act. The PSD program applies to newly constructed or modified facilities *(both of which are referred to as "new sources")* which increase air emissions. The Clean Air Act Amendments of 1977 exclude small new sources of air emissions from the PSD review program. Any new source in an industrial category listed in Table 3 of these instructions whose potential to emit is less than 100 tons per year is not required to get a PSD permit. In addition, any new source in an industrial category not listed in Table 3 whose potential to emit is less than 250 tons per year is exempted from the PSD requirements.

Modified sources which increase their net emissions *(the difference between the total emission increases and total emission decreases at the source)* less than the significant amount set forth in EPA regulations are also exempt from PSD requirements. Contact your EPA Regional office *(Table 1)* for further information.

SECTION D – GLOSSARY

NOTE: This Glossary includes terms used in the instructions and in Forms 1, 2B, 2C, and 3. Additional terms will be included in the future when other forms are developed to reflect the requirements of other parts of the Consolidated Permits Program. If you have any questions concerning the meaning of any of these terms, please contact your EPA Regional office *(Table 1)*.

ALIQUOT means a sample of specified volume used to make up a total composite sample.

ANIMAL FEEDING OPERATION means a lot or facility *(other than an aquatic animal production facility)* where the following conditions are met:

A. Animals *(other than aquatic animals)* have been, are, or will be stabled or confined and fed or maintained for a total of 45 days or more in any 12 month period; and

B. Crops, vegetation, forage growth, or post–harvest residues are not sustained in the normal growing season over any portion of the lot or facility.

Two or more animal feeding operations under common ownership are a single animal feeding operation if they adjoin each other or if they use a common area or system for the disposal of wastes.

ANIMAL UNIT means a unit of measurement for any animal feeding operation calculated by adding the following numbers: The number of slaughter and feeder cattle multiplied by 1.0; Plus the number of mature dairy cattle multiplied by 1.4; Plus the number of swine weighing over 25 kilograms *(approximately 55 pounds)* multiplied by 0.4; Plus the number of sheep multiplied by 0.1; Plus the number of horses multiplied by 2.0.

APPLICATION means the EPA standard national forms for applying for a permit, including any additions, revisions, or modifications to the forms; or forms approved by EPA for use in approved States, including any approved modifications or revisions. For RCRA, "application" also means "Application, Part B."

APPLICATION, PART A means that part of the Consolidated Permit Application forms which a RCRA permit applicant must complete to qualify for interim status under Section 3005(e) of RCRA and for consideration for a permit. Part A consists of Form 1 *(General Information)* and Form 3 *(Hazardous Waste Application Form)*.

APPLICATION, PART B means that part of the application which a RCRA permit applicant must complete to be issued a permit. *(NOTE: EPA is not developing a specific form for Part B of the permit application, but an instruction booklet explaining what information must be supplied is available from the EPA Regional office.)*

APPROVED PROGRAM or APPROVED STATE means a State program which has been approved or authorized by EPA under 40 CFR Part 123.

AQUACULTURE PROJECT means a defined managed water area which uses discharges of pollutants into that designated area for the maintenance or production of harvestable freshwater, estuarine, or marine plants or animals. "Designated area" means the portions of the waters of the United States within which the applicant plans to confine the cultivated species, using a method of plan or operation *(including, but not limited to, physical confinement)* which, on the basis of reliable scientific evidence, is expected to ensure the specific individual organisms comprising an aquaculture crop will enjoy increased growth attributable to the discharge of pollutants and be harvested within a defined geographic area.

AQUIFER means a geological formation, group of formations, or part of a formation that is capable of yielding a significant amount of water to a well or spring.

AREA OF REVIEW means the area surrounding an injection well which is described according to the criteria set forth in 40 CFR Section 146.06.

AREA PERMIT means a UIC permit applicable to all or certain wells within a geographic area, rather than to a specified well, under 40 CFR Section 122.37.

ATTAINMENT AREA means, for any air pollutant, an area which has been designated under Section 107 of the Clean Air Act as having ambient air quality levels better than any national primary or secondary ambient air quality standard for that pollutant. Standards have been set for sulfur oxides, particulate matter, nitrogen dioxide, carbon monoxide, ozone, lead, and hydrocarbons. For purposes of the Glossary, "attainment area" also refers to "unclassifiable area," which means, for any pollutants, an area designated under Section 107 as unclassifiable with respect to that pollutant due to insufficient information.

BEST MANAGEMENT PRACTICES *(BMP)* means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States. BMP's include treatment requirements, operation procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

BIOLOGICAL MONITORING TEST means any test which includes the use of aquatic algal, invertebrate, or vertebrate species to measure acute or chronic toxicity, and any biological or chemical measure of bioaccumulation.

BYPASS means the intentional diversion of wastes from any any portion of a treatment facility.

CONCENTRATED ANIMAL FEEDING OPERATION means an animal feeding operation which meets the criteria set forth in either (A) or (B) below or which the Director designates as such on a case–by–case basis:

A. More than the numbers of animals specified in any of the following categories are confined:

1. 1,000 slaughter or feeder cattle,

2. 700 mature dairy cattle *(whether milked or dry cows)*,

3. 2,500 swine each weighing over 25 kilograms *(approximately 55 pounds)*,

4. 500 horses,

5. 10,000 sheep or lambs,

6. 55,000 turkeys,

7. 100,000 laying hens or broilers *(if the facility has a continuous overflow watering)*,

8. 30,000 laying hens or broilers *(if the facility has a liquid manure handling system)*,

9. 5,000 ducks, or

10. 1,000 animal units; or

B. More than the following numbers and types of animals are confined:

1. 300 slaughter or feeder cattle,

2. 200 mature dairy cattle *(whether milked or dry cows)*,

3. 750 swine each weighing over 25 kilograms *(approximately 55 pounds)*,

4. 150 horses,

CONCENTRATED ANIMAL FEEDING OPERATION *(continued)*

5. 3,000 sheep or lambs,

6. 16,500 turkeys,

7. 30,000 laying hens or broilers *(if the facility has continuous overflow watering)*,

8. 9,000 laying hens or broilers *(if the facility has a liquid manure handling system)*,

9. 1,500 ducks, or

10. 300 animal units; AND

Either one of the following conditions are met: Pollutants are discharged into waters of the United States through a manmade ditch, flushing system or other similar manmade device *("manmade" means constructed by man and used for the purpose of transporting wastes)*; or Pollutants are discharged directly into waters of the Unites States which originate outside of and pass over, across, or through the facility or otherwise come into direct contact with the animals confined in the operation.

Provided, however, that no animal feeding operation is a concentrated animal feeding operation as defined above if such animal feeding operation discharges only in the event of a 25 year, 24 hour storm event.

CONCENTRATED AQUATIC ANIMAL PRODUCTION FACILITY means a hatchery, fish farm, or other facility which contains, grows or holds aquatic animals in either of the following categories, or which the Director designates as such on a case—by—case basis:

A. Cold water fish species or other cold water aquatic animals including, but not limited to, the Salmonidae family of fish *(e.g., trout and salmon)* in ponds, raceways or other similar structures which discharge at least 30 days per year but does not include:

1. Facilities which produce less than 9,090 harvest weight kilograms *(approximately 20,000 pounds)* of aquatic animals per year; and

2. Facilities which feed less than 2,272 kilograms *(approximately 5,000 pounds)* of food during the calendar month of maximum feeding.

B. Warm water fish species or other warm water aquatic animals including, but not limited to, the Ameiuridae, Cetrarchidae, and Cyprinidae families of fish *(e.g., respectively, catfish, sunfish, and minnows)* in ponds, raceways, or other similar structures which discharge at least 30 days per year, but does not include:

1. Closed ponds which discharge only during periods of excess runoff; or

2. Facilities which produce less than 45,454 harvest weight kilograms *(approximately 100,000 pounds)* of aquatic animals per year.

CONTACT COOLING WATER means water used to reduce temperature which comes into contact with a raw material, intermediate product, waste product other then heat, or finished product.

CONTAINER means any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled.

CONTIGUOUS ZONE means the entire zone established by the United States under article 24 of the convention of the Territorial Sea and the Contiguous Zone.

CWA means the Clean Water Act *(formerly referred to the Federal Water Pollution Control Act)* Pub. L. 92—500, as amended by Pub. L. 95—217 and Pub. L. 95—576, 33 U.S.C. 1251 *et seq.*

DIKE means any embankment or ridge of either natural or manmade materials used to prevent the movement of liquids, sludges, solids, or other materials.

DIRECT DISCHARGE means the discharge of a pollutant as defined below.

DIRECTOR means the EPA Regional Administrator or the State Director as the context requires.

DISCHARGE *(OF A POLLUTANT)* means:

A. Any addition of any pollutant or combination of pollutants to waters of the United States from any point source; or

B. Any addition of any pollutant or combination of pollutants to the waters of the contiguous zone or the ocean from any point source other then a vessel or other floating craft which is being used as a means of transportation.

This definition includes discharges into waters of the United States from: Surface runoff which is collected or channelled by man; Discharges through pipes, sewers, or other conveyances owned by a State, municipality, or other person which do not lead to POTW's; and Discharges through pipes, sewers, or other conveyances, leading into privately owned treatment works. This term does not include an addition of pollutants by any indirect discharger.

DISPOSAL *(in the RCRA program)* means the discharge, deposit, injection, dumping, spilling, leaking, or placing of any hazardous waste into or on any land or water so that the hazardous waste or any constituent of it may enter the environment or be emitted into the air or discharged into any waters, including ground water.

DISPOSAL FACILITY means a facility or part of a facility at which hazardous waste is intentionally placed into or on land or water, and at which hazardous waste will remain after closure.

EFFLUENT LIMITATION means any restriction imposed by the Director on quantities, discharge rates, and concentrations of pollutants which are discharged from point sources into waters of the United States, the waters of the continguous zone, or the ocean.

EFFLUENT LIMITATION GUIDELINE means a regulation published by the Administrator under Section 304(b) of the Clean Water Act to adopt or revise effluent limitations.

ENVIRONMENTAL PROTECTION AGENCY *(EPA)* means the United States Environmental Protection Agency.

EPA IDENTIFICATION NUMBER means the number assigned by EPA to each generator, transporter, and facility.

EXEMPTED AQUIFER means an aquifer or its portion that meets the criteria in the definition of USDW, but which has been exempted according to the procedures in 40 CFR Section 122.35(b).

EXISTING HWM FACILITY means a Hazardous Waste Management facility which was in operation, or for which construction had commenced, on or before October 21, 1976. Construction had commenced if (A) the owner or operator had obtained all necessary Federal, State, and local preconstruction approvals or permits, and either (B1) a continuous on—site, physical construction program had begun, or (B2) the owner or operator had entered into contractual obligations, which could not be cancelled or modified without substantial loss, for construction of the facility to be completed within a reasonable time.

(NOTE: This definition reflects the literal language of the statute. However, EPA believes that amendments to RCRA now in conference will shortly be enacted and will change the date for determining when a facility is an "existing facility" to one no earlier than May of 1980; indications are the conferees are considering October 30, 1980. Accordingly, EPA encourages every owner or operator of a facility which was built or under construction as of the promulgation date of the RCRA program regulations to file Part A of its permit application so that it can be quickly processed for interim status when the change in the law takes effect. When those amendments are enacted, EPA will amend this definition.)

EXISTING SOURCE or EXISTING DISCHARGER *(in the NPDES program)* means any source which is not a new source or a new discharger.

EXISTING INJECTION WELL means an injection well other than a new injection well.

FACILITY means any HWM facility, UIC underground injection well, NPDES point source, PSD stationary source, or any other facility or activity *(including land or appurtenances thereto)* that is subject to regulation under the RCRA, UIC, NPDES, or PSD programs.

FLUID means material or substance which flows or moves whether in a semisolid, liquid, sludge, gas, or any other form or state.

GENERATOR means any person by site, whose act or process produces hazardous waste identified or listed in 40 CFR Part 261.

GROUNDWATER means water below the land surface in a zone of saturation.

HAZARDOUS SUBSTANCE means any of the substances designated under 40 CFR Part 116 pursuant to Section 311 of CWA. *(NOTE: These substances are listed in Table 2c—4 of the instructions to Form 2C.)*

HAZARDOUS WASTE means a hazardous waste as defined in 40 CFR Section 261.3 published May 19, 1980.

HAZARDOUS WASTE MANAGEMENT FACILITY *(HWM facility)* means all contiguous land, structures, appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous wastes. A facility may consist of several treatment, storage, or disposal operational units *(for example, one or more landfills, surface impoundments, or combinations of them)*.

IN OPERATION means a facility which is treating, storing, or disposing of hazardous waste.

INCINERATOR *(in the RCRA program)* means an enclosed device using controlled flame combustion, the primary purpose of which is to thermally break down hazardous waste. Examples of incinerators are rotary kiln, fluidized bed, and liquid injection incinerators.

INDIRECT DISCHARGER means a nondomestic discharger introducing pollutants to a publicly owned treatment works.

INJECTION WELL means a well into which fluids are being injected.

INTERIM AUTHORIZATION means approval by EPA of a State hazardous waste program which has met the requirements of Section 3006(c) of RCRA and applicable requirements of 40 CFR Part 123, Subparts A, B, and F.

LANDFILL means a disposal facility or part of a facility where hazardous waste is placed in or on land and which is not a land treatment facility, a surface impoundment, or an injection well.

LAND TREATMENT FACILITY *(in the RCRA program)* means a facility or part of a facility at which hazardous waste is applied onto or incorporated into the soil surface; such facilities are disposal facilities if the waste will remain after closure.

LISTED STATE means a State listed by the Administrator under Section 1422 of SDWA as needing a State UIC program.

MGD means millions of gallons per day.

MUNICIPALITY means a city, village, town, borough, county, parish, district, association, or other public body created by or under State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of CWA.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)* means the national program for issuing modifying, revoking and reissuing, terminating, monitoring, and enforcing permits and imposing and enforcing pretreatment requirements, under Sections 307, 318, 402, and 405 of CWA. The term includes an approved program.

NEW DISCHARGER means any building, structure, facility, or installation: (A) From which there is or may be a new or additional discharge of pollutants at a site at which on October 18, 1972, it had never discharged pollutants; (B) Which has never received a finally effective NPDES permit for discharges at that site; and (C) Which is not a "new source." This definition includes an indirect discharger which commences discharging into waters of the United States. It also includes any existing mobile point source, such as an offshore oil drilling rig, seafood processing vessel, or aggregate plant that begins discharging at a location for which it does not have an existing permit.

NEW HWM FACILITY means a Hazardous Waste Management facility which began operation or for which construction commenced after October 21, 1976.

NEW INJECTION WELL means a well which begins injection after a UIC program for the State in which the well is located is approved.

NEW SOURCE *(in the NPDES program)* means any building, structure, facility, or installation from which there is or may be a discharge of pollutants, the construction of which commenced:

A. After promulgation of standards of performance under Section 306 of CWA which are applicable to such source; or

B. After proposal of standards of performance in accordance with Section 306 of CWA which are applicable to such source, but only if the standards are promulgated in accordance with Section 306 within 120 days of their proposal.

NON—CONTACT COOLING WATER means water used to reduce temperature which does not come into direct contact with any raw material, intermediate product, waste product *(other than heat)*, or finished product.

OFF—SITE means any site which is not "on—site."

ON—SITE means on the same or geographically contiguous property which may be divided by public or private right*(s)*—of—way, provided the entrance and exit between the properties is at a cross—roads intersection, and access is by crossing as opposed to going along, the right*(s)*—of—way. Non—contiguous properties owned by the same person, but connected by a right—of—way which the person controls and to which the public does not have access, is also considered on—site property.

OPEN BURNING means the combustion of any material without the following characteristics:

A. Control of combustion air to maintain adequate temperature for efficient combustion;

B. Containment of the combustion—reaction in an enclosed device to provide sufficient residence time and mixing for complete combustion; and

C. Control of emission of the gaseous combustion products.

(See also "incinerator" and "thermal treatment").

OPERATOR means the person responsible for the overall operation of a facility.

OUTFALL means a point source.

OWNER means the person who owns a facility or part of a facility.

PERMIT means an authorization, license, or equivalent control document issued by EPA or an approved State to implement the requirements of 40 CFR Parts 122, 123, and 124.

PHYSICAL CONSTRUCTION *(in the RCRA program)* means excavation, movement of earth, erection of forms or structures, or similar activity to prepare a HWM facility to accept hazardous waste.

PILE means any noncontainerized accumulation of solid, nonflowing hazardous waste that is used for treatment or storage.

POINT SOURCE means any discernible, confined, and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture.

POLLUTANT means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical waste, biological materials, radioactive materials *(except those regulated under the Atomic Energy Act of 1954, as amended (42 U.S.C. Section 2011 et seq.))*, heat, wrecked or discarded equipment, rocks, sand, cellar dirt and industrial, municipal, and agriculture waste discharged into water. It does not mean:

A. Sewage from vessels; or

B. Water, gas, or other material which is injected into a well to facilitate production of oil or gas, or water derived in association with oil and gas production and disposed of in a well, if the well used either to facilitate production or for disposal purposes is approved by authority of the State in which the well is located, and if the State determines that the injection or disposal will not result in the degradation of ground or surface water resources.

(NOTE: Radioactive materials covered by the Atomic Energy Act are those encompassed in its definition of source, byproduct, or special nuclear materials. Examples of materials not covered include radium and accelerator produced isotopes. See Train v. Colorado Public Interest Research Group, Inc., 426 U.S. 1 (1976).)

PREVENTION OF SIGNIFICANT DETERIORATION *(PSD)* means the national permitting program under 40 CFR 52.21 to prevent emissions of certain pollutants regulated under the Clean Air Act from significantly deteriorating air quality in attainment areas.

PRIMARY INDUSTRY CATEGORY means any industry category listed in the NRDC Settlement Agreement *(Natural Resources Defense Council v. Train, 8 ERC 2120 [D.D.C. 1976], modified 12 ERC 1833 [D.D.C. 1979])*.

PRIVATELY OWNED TREATMENT WORKS means any device or system which is: (A) Used to treat wastes from any facility whose operator is not the operator of the treatment works; and (B) Not a POTW.

PROCESS WASTEWATER means any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.

PUBLICLY OWNED TREATMENT WORKS or POTW means any device or system used in the treatment *(including recycling and reclamation)* of municipal sewage or industrial wastes of a liquid nature which is owned by a State or municipality. This definition includes any sewers, pipes, or other conveyances only if they convey wastewater to a POTW providing treatment.

RENT means use of another's property in return for regular payment.

RCRA means the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act of 1976 *(Pub. L. 94–580, as amended by Pub. L. 95–609, 42 U.S.C. Section 6901 et seq.)*.

ROCK CRUSHING AND GRAVEL WASHING FACILITIES are facilities which process crushed and broken stone, gravel, and riprap *(see 40 CFR Part 436, Subpart B, and the effluent limitations guidelines for these facilities)*.

SDWA means the Safe Drinking Water Act *(Pub. L. 95–523, as amended by Pub. L. 95–1900, 42 U.S.C. Section 300(f) et seq.)*.

SECONDARY INDUSTRY CATEGORY means any industry category which is not a primary industry category.

SEWAGE FROM VESSELS means human body wastes and the wastes from toilets and other receptacles intended to receive or retain body wastes that are discharged from vessels and regulated under Section 312 of CWA, except that with respect to commercial vessels on the Great Lakes this term includes graywater. For the purposes of this definition, "graywater" means galley, bath, and shower water.

SEWAGE SLUDGE means the solids, residues, and precipitate separated from or created in sewage by the unit processes of a POTW. "Sewage" as used in this definition means any wastes, including wastes from humans, households, commercial establishments, industries, and storm water runoff, that are discharged to or otherwise enter a publicly owned treatment works.

SILVICULTURAL POINT SOURCE means any discernable, confined, and discrete conveyance related to rock crushing, gravel washing, log sorting, or log storage facilities which are operated in connection with silvicultural activities and from which pollutants are discharged into waters of the United States. This term does not include nonpoint source silvicultural activities such as nursery operations, site preparation, reforestation and subsequent cultural treatment, thinning, prescribed burning, pest and fire control, harvesting operations, surface drainage, or road construction and maintenance from which there is natural runoff. However, some of these activities *(such as stream crossing for roads)* may involve point source discharges of dredged or fill material which may require a CWA Section 404 permit. "Log sorting and log storage facilities" are facilities whose discharges result from the holding of unprocessed wood, e.g., logs or roundwood with bark or after removal of bark in self–contained bodies of water *(mill ponds or log ponds)* or stored on land where water is applied intentionally on the logs *(wet decking)*. *(See 40 CFR Part 429, Subpart J, and the effluent limitations guidelines for these facilities.)*

STATE means any of the 50 States, the District of Columbia, Guam, the Commonwealth of Puerto Rico, the Virgin Islands, American Samoa, the Trust Territory of the Pacific Islands *(except in the case of RCRA)*, and the Commonwealth of the Northern Mariana Islands *(except in the case of CWA)*.

STATIONARY SOURCE *(in the PSD program)* means any building, structure, facility, or installation which emits or may emit any air pollutant regulated under the Clean Air Act. "Building, structure, facility, or installation" means any grouping of pollutant–emitting activities which are located on one or more contiguous or adjacent properties and which are owned or operated by the same person *(or by persons under common control)*.

STORAGE *(in the RCRA program)* means the holding of hazardous waste for a temporary period at the end of which the hazardous waste is treated, disposed, or stored elsewhere.

STORM WATER RUNOFF means water discharged as a result of rain, snow, or other precipitation.

SURFACE IMPOUNDMENT or IMPOUNDMENT means a facility or part of a facility which is a natural topographic depression, manmade excavation, or diked area formed primarily of earthen materials *(although it may be lined with manmade materials)*, which is designed to hold an accumulation of liquid wastes or wastes containing free liquids, and which is not an injection well. Examples of surface impoundments are holding, storage, settling, and aeration pits, ponds, and lagoons.

TANK *(in the RCRA program)* means a stationary device, designed to contain an accumulation of hazardous waste which is constructed primarily of non–earthen materials *(e.g., wood, concrete, steel, plastic)* which provide structural support.

THERMAL TREATMENT *(in the RCRA program)* means the treatment of hazardous waste in a device which uses elevated temperature as the primary means to change the chemical, physical, or biological character or composition of the hazardous waste. Examples of thermal treatment processes are incineration, molten salt, pyrolysis, calcination, wet air oxidation, and microwave discharge. *(See also "Incinerator" and "open burning").*

TOTALLY ENCLOSED TREATMENT FACILITY *(in the RCRA program)* means a facility for the treatment of hazardous waste which is directly connected to an industrial production process and which is constructed and operated in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment during treatment. An example is a pipe in which waste acid is neutralized.

TOXIC POLLUTANT means any pollutant listed as toxic under Section 307(a)(1) of CWA.

TRANSPORTER *(in the RCRA program)* means a person engaged in the off–site transportation of hazardous waste by air, rail, highway, or water.

TREATMENT *(in the RCRA program)* means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non–hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume.

UNDERGROUND INJECTION means well injection.

UNDERGROUND SOURCE OF DRINKING WATER or USDW means an aquifer or its portion which is not an exempted aquifer and:

A. Which supplies drinking water for human consumption; or

B. In which the ground water contains fewer than 10,000 mg/l total dissolved solids.

UPSET means an exceptional incident in which there is unintentional and temporary noncompliance with technology–based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

WATERS OF THE UNITED STATES means:

A. All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;

B. All interstate waters, including interstate wetlands;

C. All other waters such as intrastate lakes, rivers, streams *(including intermittent streams)*, mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, and natural ponds, the use, degradation, or destruction of which would or could affect interstate or foreign commerce including any such waters:

1. Which are or could be used by interstate or foreign travelers for recreational or other purposes,

2. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce,

3. Which are used or could be used for industrial purposes by industries in interstate commerce;

D. All impoundments of waters otherwise defined as waters of the United States under this definition;

E. Tributaries of waters identified in paragraphs (A) – (D) above;

F. The territorial sea; and

G. Wetlands adjacent to waters *(other than waters that are themselves wetlands)* identified in paragraphs (A) – (F) of this definition.

Waste treatment systems, including treatment ponds or lagoons designed to meet requirement of CWA *(other than cooling ponds as defined in 40 CFR Section 423.11(m) which also meet the criteria of this definition)* are not waters of the United States. This exclusion applies only to manmade bodies of water which neither were originally created in waters of the United States *(such as a disposal area in wetlands)* nor resulted from the impoundments of waters of the United States.

WELL INJECTION or UNDERGROUND INJECTION means the subsurface emplacement of fluids through a bored, drilled, or driven well; or through a dug well, where the depth of the dug well is greater than the largest surface dimension.

WETLANDS means those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

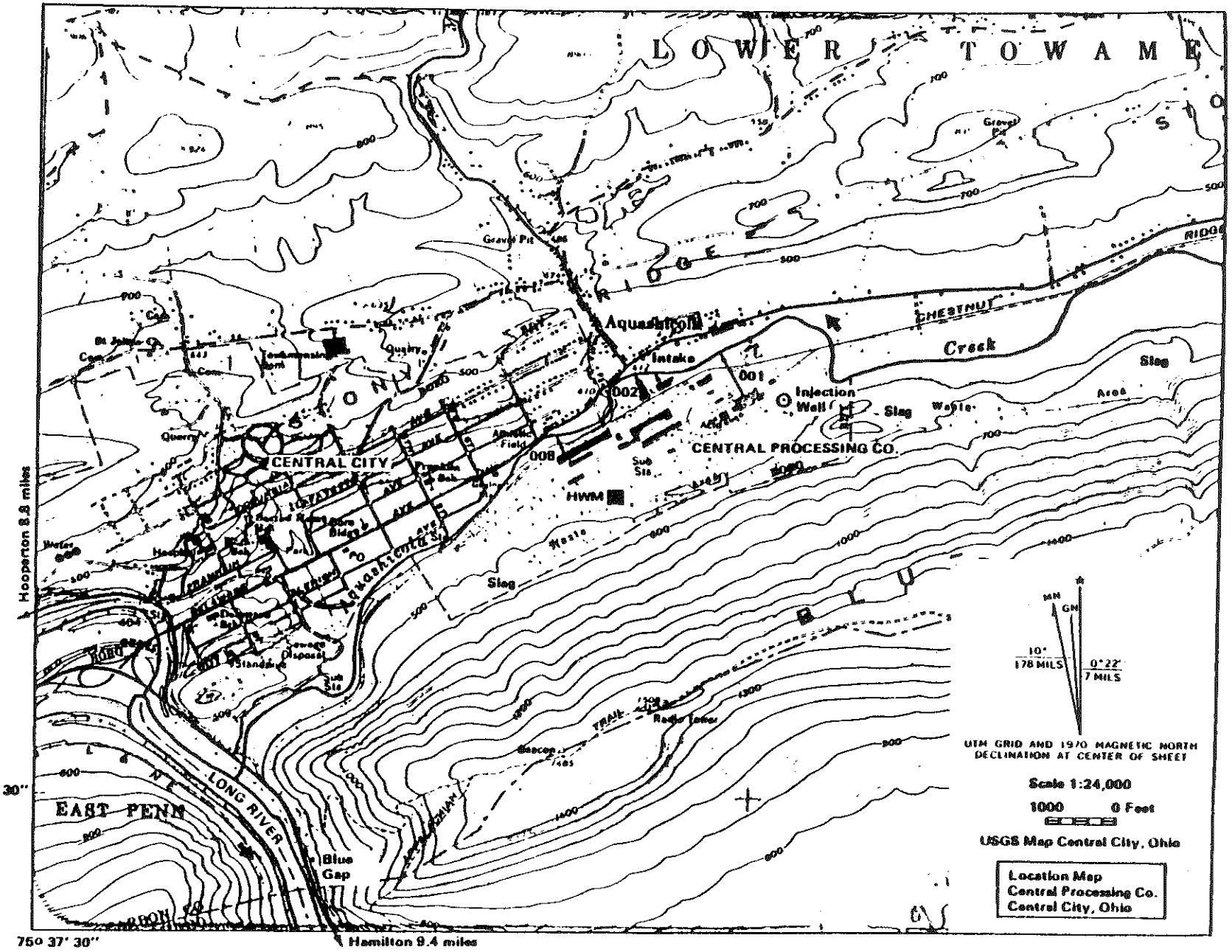

LOWER TOWAMENSING
CENTRAL CITY
CENTRAL PROCESSING CO.
Aquashicola
Intake
Creek
CHESTNUT
RIDGE
Injection Well
001
002
008
HWM
Slag
Waste
Area
Hooperton 8.8 miles
40° 47' 30"
75° 37' 30"
Hamilton 9.4 miles
EAST PENN
LONG RIVER
Blue Gap
TRAIL
Radio Tower
Beacon
MN
GN
10°
178 MILS
0°22'
7 MILS
UTM GRID AND 1970 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET
Scale 1:24,000
1000 0 Feet
USGS Map Central City, Ohio
Location Map
Central Processing Co.
Central City, Ohio

FIGURE 1-1

(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F ILD000665489 D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP COMMONWEALTH EDISON DRESDEN STATION

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 T. E. HEMMINGER	312 294 4433

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 P O BOX 767

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 CHICAGO	IL	60690

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 LORENZO RD. 4 MI W. of I-55

B. COUNTY NAME

GRUNDY

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 MORRIS	IL	60450	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
7 4911 (specify) Electric Power Generation	7 (specify)
C. THIRD	**D. FOURTH**
7 (specify)	7 (specify)

VIII. OPERATOR INFORMATION

A. NAME

8 COMMONWEALTH EDISON COMPANY

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE

P (specify)

D. PHONE (area code & no.)

A 312 294 4433

E. STREET OR P.O. BOX

P. O. BOX 767

F. CITY OR TOWN

B CHICAGO

G. STATE IL

H. ZIP CODE 60690

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	B. PSD (Air Emissions from Proposed Sources)
9 N IL0002224	9 P NA
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
9 U NA	9 7302078 3 (specify) Air Operating Permit
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify) See Attachment 1
9 R NA	9 NA (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. See Attachment 2

XII. NATURE OF BUSINESS (provide a brief description)

Generation of Electricity Using Nuclear Fuel

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
T. E. Hemminger Environemntal Services Manager	Thomas E Hemminger	10-26-90

COMMENTS FOR OFFICIAL USE ONLY

C

United States
Environmental Protection
Agency

Office of Water and
Hazardous Materials
Washington, DC 20460

EPA Form 3510-3
June 1980

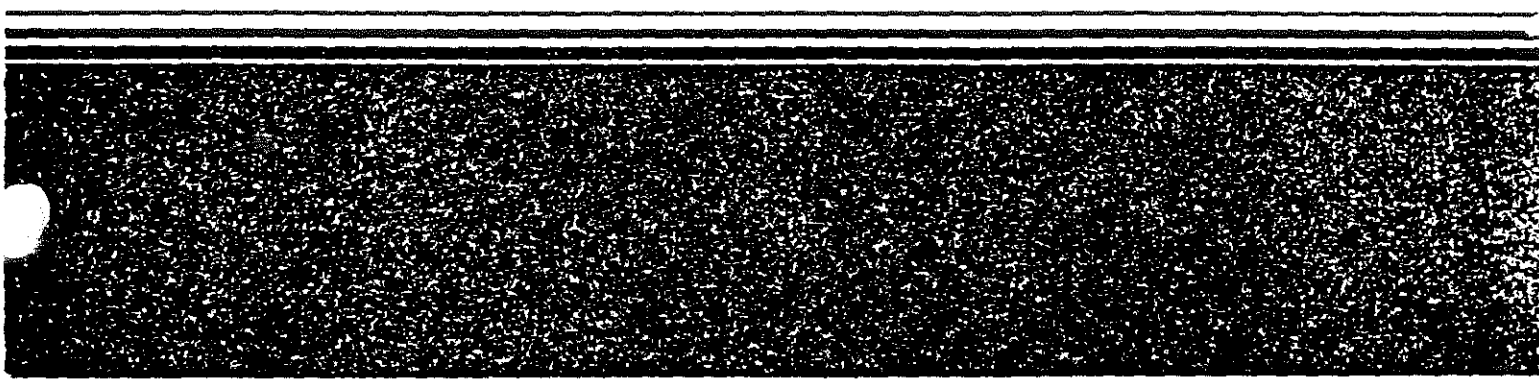
Solid Waste

EPA

Application Form 3 - Hazardous Waste Information

Consolidated Permits Program

This form must be completed by all persons applying for an EPA hazardous waste permit.



FORM 3 – GENERAL INFORMATION

This form must be completed by all applicants who check "yes" to Item II–E in Form 1.

Permit Application Process

There are two parts to a RCRA permit application – Part A and Part B. Part A consists of this form and Form 1 of the Consolidated Permit Application. Part B requires detailed site–specific information such as geologic, hydrologic, and engineering data. 40 CFR 122.25 specifies the information that will be required from hazardous waste management facilities in Part B.

RCRA established a procedure for obtaining "interim status" which allows existing hazardous waste management facilities to continue their operations until a final hazardous waste permit is issued. In order to qualify for interim status, existing hazardous waste management facilities must submit Part A of the permit application to EPA within six months after the promulgation of regulations under Section 3001 of RCRA *(40 CFR Part 261)*. In order to receive a hazardous waste permit, existing facilities must submit a complete Part B within six months after it is requested by EPA. New facilities must submit both Part A and Part B to EPA at least 180 days before physical construction is expected to commence.

Operation During Interim Status

As provided in 40 CFR 122.23(b), Part A of the permit application defines the processes to be used for treatment, storage, and disposal of hazardous wastes; the design capacity of such processes; and the specific hazardous wastes to be handled at a facility during the interim status period. Once Part A is submitted to EPA, changes in the hazardous wastes handled, changes in design capacities, changes in processes, and changes in ownership or operational control at a facility during the interim status period may only be made in accordance with the procedures in 40 CFR 122.23(c). Changes in design capacity and changes in processes require prior EPA approval. Changes in the quantity of waste handled at a facility during interim status can be made without submitting a revised Part A provided the quantity does not exceed the design capacities of the processes specified in Part A of the permit application. Failure to furnish all information required to process a permit application is grounds for termination of interim status.

Confidential Information

All information submitted in this form will be subject to public disclosure, to the extent provided by RCRA and the Freedom of Information Act, 5 U.S.C. Section 552, and EPA's Business Confidentiality Regulations, 40 CFR Part 2 *(see especially 40 CFR 2.305)*. Persons filing this form may make claims of confidentiality. Such claims must be clearly indicated by marking "confidential" on the specific information on the form for which confidential treatment is requested or on any attachments, and must be accompanied, at the time of filing, by a written substantiation of the claim, by answering the following questions:

Confidential Information *(continued)*

A. Which portions of the information do you claim are entitled to confidential treatment?

B. For how long is confidential treatment desired for this information?

C. What measures have you taken to guard against undesired disclosure of the information to others?

D. To what extent has the information been disclosed to others, and what precautions have been taken in connection with that disclosure?

E. Has EPA or any other Federal agency made a pertinent confidentiality determination? If so, include a copy of such determination or reference to it, if available.

F. Will disclosure of the information be likely to result in substantial harmful effects on your competitive position? If so, what would those harmful effects be and why should they be viewed as substantial? Explain the causal relationship between disclosure and the harmful effects.

Information covered by a confidentiality claim and the above substantiation will be disclosed by EPA only to the extent and by means of the procedures set forth in 40 CFR Part 2.

If no claim of confidentiality or no substantiation accompanies the information when it is submitted, EPA may make the information available to the public without further notice to the submitter.

Definitions

Terms used in these instructions and in this form are defined in the Glossary section of the instructions to Form 1. For additional definitions and procedures to use in applying for a permit for a hazardous waste management facility, refer to the regulations promulgated under Section 3005 of RCRA and published in 40 CFR Parts 122 and 124.

FORM 3 LINE–BY–LINE INSTRUCTIONS

Completing This Form

Please type or print in the unshaded areas only. Some items have small graduation marks or boxes in the fill–in spaces. These marks indicate the number of characters that may be entered into our data system. The marks are spaced at 1/6" intervals which accommodate elite type *(12 characters per inch – one space between letters)*. If you do not have a typewriter with elite type then please print, placing each character between the marks. Abbreviate if necessary to stay within the number of characters allowed for each item. Use one space for breaks between words, but not for punctuation marks unless the space is needed to clarify your information.

Item I

Existing hazardous waste management facilities should enter their EPA Identification Number *(if known)*. New facilities should leave this item blank.

Item II

A. FIRST APPLICATION. If this is the first application that is being filed for the facility place an "X" in either the Existing Facility box or the New Facility box.

1. EXISTING FACILITY. Existing facilities are:

   a. Those facilities which received hazardous waste for treatment, storage, and/or disposal on or before October 21, 1976, or

   b. Those facilities for which construction had commenced on or before October 21, 1976. Construction had "commenced" only if:

      (1) The owner or operator had obtained all necessary Federal, State, and local preconstruction approvals or permits; and

Item II *(continued)*

(2-a) A continuous physical, on-site construction program had begun *(facility design or other preliminary non-physical and non-site specific preparatory activities do not constitute an on-site construction program)*, or

(2-b) The owner or operator had entered into contractual obligations *(options to purchase or contracts for feasibility, engineering, and design studies do not constitute contractual obligations)* which could not be cancelled or modified without substantial loss. Generally, a loss is deemed substantial if the amount an owner or operator must pay to cancel construction agreements or stop construction exceeds 10% of the total project cost.

(NOTE: This definition of "existing facility" reflects the literal language of the statute. However, EPA believes that amendments to RCRA now in conference will shortly be enacted and will change the date for determining when a facility is an "existing facility" to one no earlier than May of 1980; indications are the conferees are considering October 30, 1980. When those amendments are enacted, EPA will amend the definition of "existing facility."

Accordingly, EPA encourages every facility built or under construction on the promulgation date of the RCRA program regulations to notify EPA and file Part A of the permit application so that it can be quickly processed for interim status when the change in the law takes effect.)

EXISTING FACILITY DATE. If the Existing Facility box is marked, enter the date hazardous waste operations began *(i.e., the date the facility began treating, storing, or disposing of hazardous waste)* or the date construction commenced.

2. NEW FACILITY. New facilities are all facilities for which construction commenced, or will commence, after October 21, 1976.

NEW FACILITY DATE. If the New Facility box is marked, enter the date that operation began or is expected to begin.

B. REVISED APPLICATION. If this is a subsequent application that is being filed to amend data filed in a previous application, place an "X" in the appropriate box to indicate whether the facility has interim status or a permit.

1. FACILITY HAS INTERIM STATUS. Place an "X" in this box if this is a revised application to make changes at a facility during the interim status period.

2. FACILITY HAS A PERMIT. Place an "X" in this box if this is a revised application to make changes at a facility for which a permit has been issued.

(NOTE: When submitting a revised application, applicants must resubmit in their entirety each item on the application for which changes are requested. In addition, Items I and IX (and Item X if applicable) must be completed. It is not necessary to resubmit information for other items that will not change).

Item III

The information in Item III describes all the processes that will be used to treat, store, or dispose of hazardous waste at the facility. The design capacity of each process must be provided as part of the description. The design capacity of injection wells and landfills at existing facilities should be measured as the remaining, unused capacity. See the form for the detailed instructions to Item III.

Item IV

The information in Item IV describes all the hazardous wastes that will be treated, stored, or disposed at the facility. In addition, the processes that will be used to treat, store, or dispose of each waste and the estimated annual quantity of each waste must be provided. See the form for the detailed instructions to Item IV.

Item V

All existing facilities must include a drawing showing the general layout of the facility. This drawing should be approximately to scale an fit in the space provided on the form. This drawing should show th following:

The property boundaries of the facility;

The areas occupied by all storage, treatment, or disposal operations that will be used during interim status;

The name of each operation. *(Example – multiple hearth incinerator, drum storage area, etc.)*;

Areas of past storage, treatment, or disposal operations;

Areas of future storage, treatment, or disposal operations; and

The approximate dimensions of the property boundaries and all storage, treatment, and disposal areas.

See Figure 3–1 for an example of a facility drawing. New facilities do not have to complete this item.

Item VI

All existing facilities must include photographs that clearly delineate all existing structures; all existing areas for storing, treating, or disposing of hazardous waste; and all known sites of future storage, treatment, or disposal operations. Photographs may be color or black and white, ground–level or aerial. Indicate the date the photograph was taken on the back of each photograph.

Item VII

Enter the latitude and longitude of the facility in degrees, minutes, and seconds. For larger facilities, enter the latitude and longitude at the approximate mid–point of the facility. You may use the map you provided for Item XI of Form 1 to determine latitude and longitude. Latitude and longitude information is also available from Regional Offices of the U.S. Department of Interior, Geological Survey and from State Agencies, such as the Department of Natural Resources.

Item VIII

See the form for the instructions to Item VIII.

Item IX and Item X

All facility owners must sign Item IX. If the facility will be operated by someone other than the owner, then the operator must sign Item X. Federal regulations require the certification to be signed as follows:

A. For a corporation, by a principal executive officer at least the level of vice president;

B. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or

C. For a municipality, State, Federal, or other public facility, by either a principal executive officer or ranking elected official.

The Resource Conservation and Recovery Act provides for severe penalties for submitting false information on this application form.

Section 3008(d) of the Resource Conservation and Recovery Act provides that "Any person who knowingly makes any false statement or representation in any application, . . . shall, upon conviction be subject to a fine of not more than $25,000 for each day of violation, or to imprisonment not to exceed one year, or both."

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING (see [illegible])

EXAMPLE

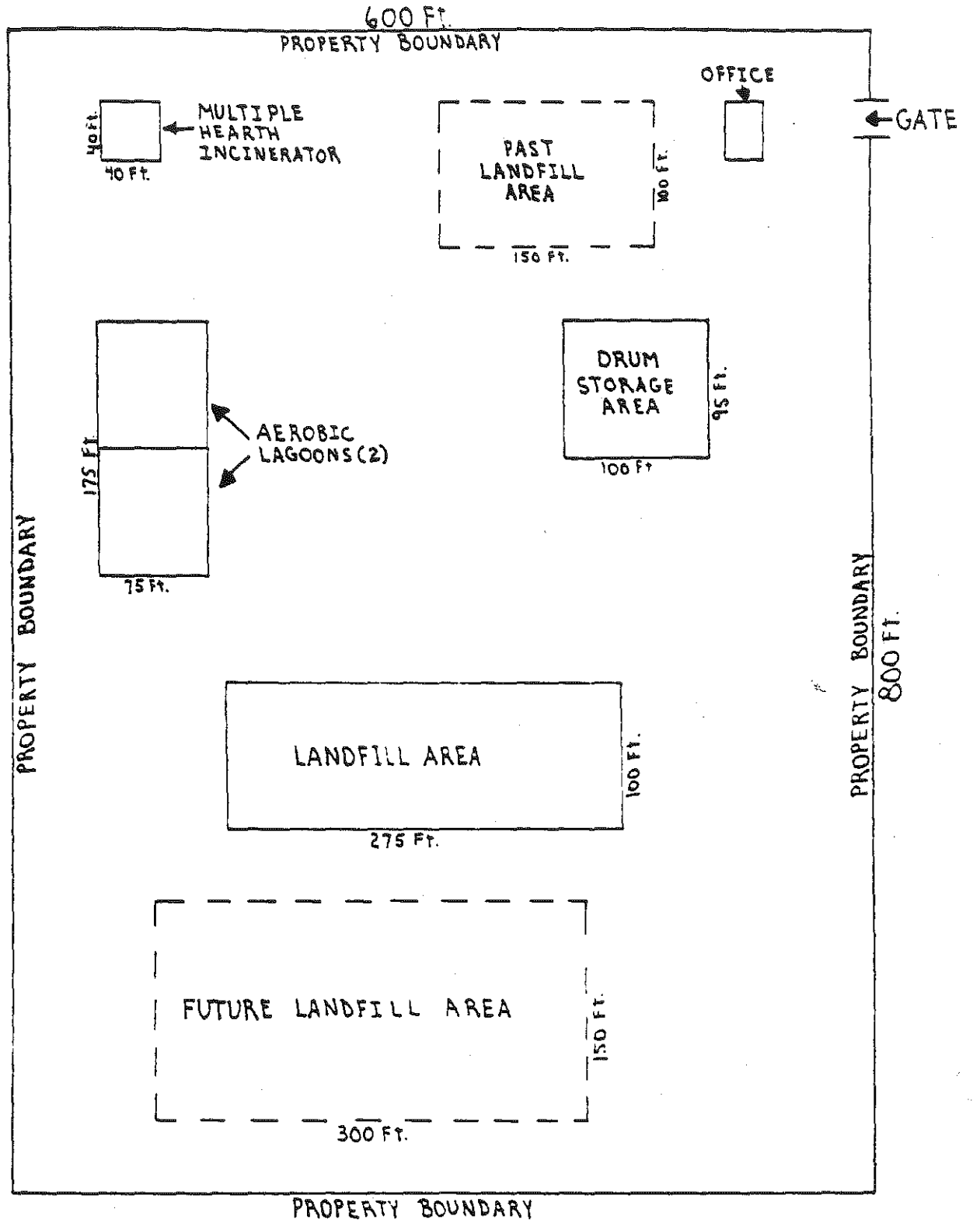


FIGURE 3-1

DRESDEN

Please print or type in the unshaded areas only (fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F I L D 0 0 0 6 6 5 4 8 9

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

[X] 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
87	07	06

[ ] 2. NEW FACILITY (Complete item below.)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION (place an "X" below and complete Item I above)

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. **PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. **PROCESS DESIGN CAPACITY** – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR OR GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	S01	3300	G	
2				
3				
4				

* For the existing facility, mixed waste has been controlled at this facility since July 6, 1987. However, mixed waste was not regulated until the IEPA received authority on May 1, 1990, effective November 1, 1990.

Continued from the front.

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES INCLUDE DESIGN CAPACITY. ...R DESCRIBING OTHER PROCESSES (code "T04 ... OR EACH PROCESS ENTERED HERE

N/A

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before co... ing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)

W I L D 0 0 0 6 6 5 4 8 9 — T/A: 1 — C

FOR OFFICIAL USE ONLY

W DUP — T/A: 2 — C: DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F002	4390	P	S01	
2	F001	1925	P	S01	
3	D008	7150	P	S01	
4	D001	1776	P	S01	
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE

N/A

EPA I.D. NO. (enter from page 1)

F I L D 0 0 0 6 6 5 4 8 9 T/A 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail) See Attachment 3

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail). See Attachment 4

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 24 00	88 18 00

VIII. FACILITY OWNER

X A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
T. E. Hemminger	Thomas E Hemminger	10-26-90

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

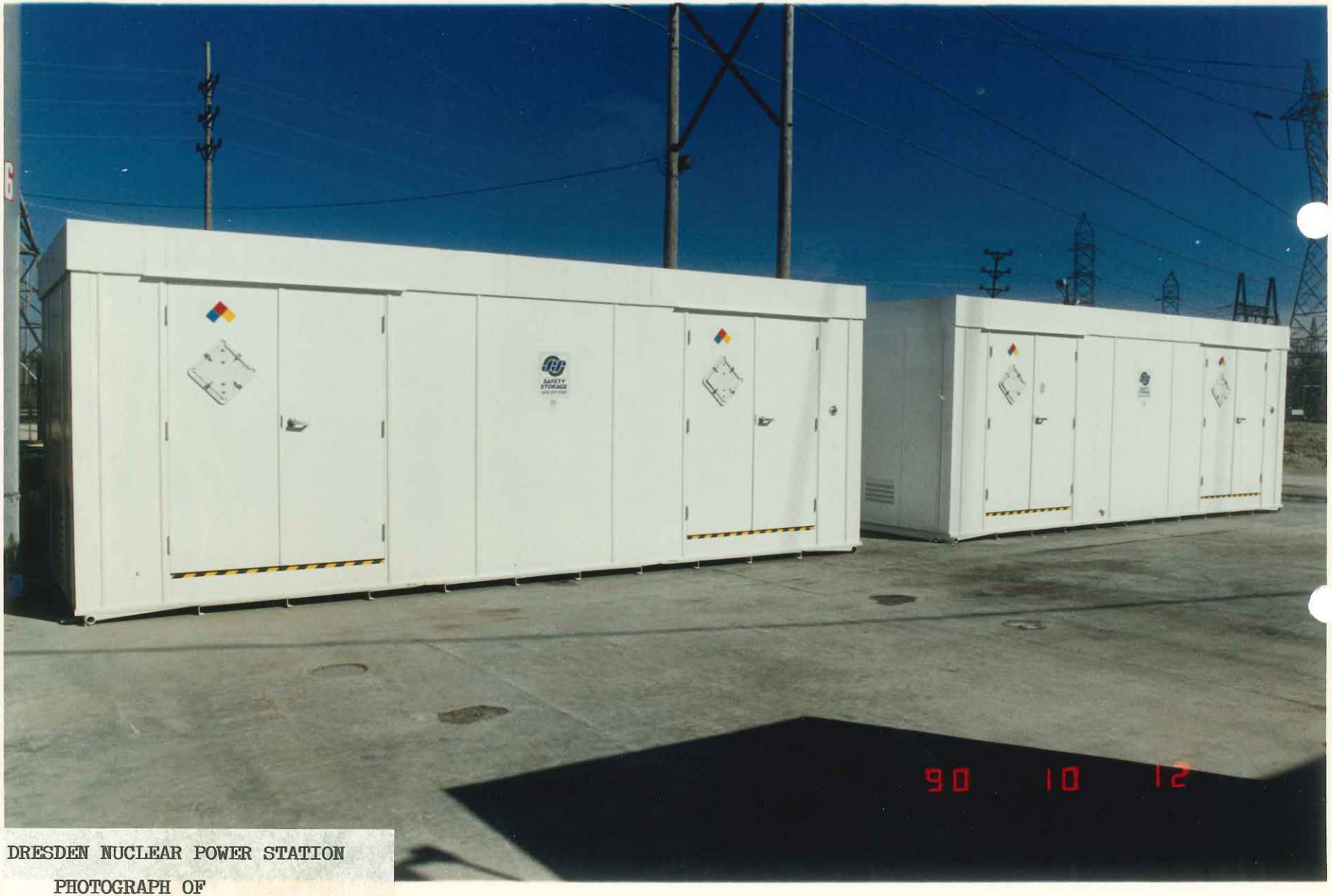
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
T. E. Hemminger	Thomas E Hemminger	10-26-90

ATTACHMENT 4

COMMONWEALTH EDISON DRESDEN STATION

Part A of RCRA Application Form 3 line vi

Photographs for Commonwealth Edison Dresden Station



DRESDEN NUCLEAR POWER STATION

PHOTOGRAPH OF

MIXED WASTE STORAGE FACILITY

C.2 Compliance/ Enforcement

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR RENEE CIPRIANO, DIRECTOR

217/524-3300

March 26, 2004

Exelon Generation Company LLC
Attn: Mr. Keith Jury
Director Licensing and Regulatory Affairs
4300 Winfield Road
Warren, Illinois 60555

Re: 0630605014 -- Grundy County
Exelon - Dresden Nuclear Power Station
ILD000665489
Log No. PS02-171
Received: July 23, 2002 and November 19, 2002
RCRA Permit File

Dear Mr. Jury:

Based on a review of information previously submitted to the Illinois EPA, the hazardous waste management units subject to RCRA regulation at the above-referenced facility are two (2) hazardous waste container storage (S01) areas that include an area known as the "Mixed Waste Facility" and three "Haz-Bin" storage trailers. Exelon's Dresden Nuclear Power Station (Dresden Station) has a Part A application and has been operating under interim status for the purpose of storing mixed waste while disposal outlets were identified.

This is in response to two separate letters regarding Exelon Generation Company LLC's request for conditional exemption for Low-Level Mixed Waste (LLMW) Storage, Treatment, Transportation and Disposal in accordance with 40 CFR 266, Subpart N (35 Ill. Adm. Code 726, Subpart N) at the above-referenced facility. The contents of the subject submittals can be summarized as follows:

- **Letter from Timothy V. Fisk on behalf of the above-referenced facility (Dresden Station) dated July 11, 2002 and received July 23, 2002 by the Illinois EPA.**

  Letter requested conditional exemption for waste codes D001, D002, D004 through D042, and F001 through F005. Letter stated that "We are currently in compliance with Title 35 Illinois Administrative Code Part 726, Subpart N." In addition, letter requested that the Illinois EPA "...provide instruction on the protocol for relinquishing the Part A Interim Status."

- **Submittal from Dave Wozniak of Exelon Generation dated November 14, 2002 and received November 19, 2002.**

  Letter contains support documentation for Exelon's contention that attachment of drum heaters to LLMW drums for treatment by heating (drying) drum contents is not intended to be regulated under RCRA. In addition, the letter states that "...RCRA container storage locations have not been utilized in the past for the storage of hazardous wastes for periods exceeding 90 days."

Based on a review of the subject submittals, it appears that Exelon's Dresden Station has met the requirements of 35 Ill. Adm. Code 726.320 – Storage and Treatment Conditional Exemption; 35 Ill. Adm. Code 726.325 – Wastes Eligible for a Storage and Treatment Conditional Exemption for Low-Level Mixed Waste; 35 Ill. Adm. Code 726.330 – Conditions to Qualify for and Maintain a Storage and Treatment Conditional Exemption and 35 Ill. Adm. Code 726.335 – Treatment Allowed by a Storage and Treatment Conditional Exemption (the proposal to treat waste in containers by attaching drum heaters to the LLMW containers appears to be consistent with the types of treatment NRC currently allows in a tank or container). Likewise, it appears that in accordance with 35 Ill. Adm. Code 726.360 – Applicability of Closure Requirements to Storage Units, the two (2) above-referenced S01 units are not subject to the closure requirements of 35 Ill. Adm. Code 725. As such, Exelon's Dresden Station is exempt from RCRA storage and treatment requirements as long as the waste is generated under a single Nuclear Regulatory Commission (NRC) license, meets the applicable conditions specified in 35 Ill. Adm. Code 726 Subpart N, and is stored and treated in a tank or container.

In addition, Exelon Dresden Station's LLMW, identified as D001, D002, D004 through D042, and F001 through F005, which meet applicable treatment standards identified in 35 Ill. Adm. Code 726 Subpart N, may be conditionally exempt from RCRA transportation and disposal requirements. This waste may be disposed of at low-level radioactive waste disposal facilities which are licensed by NRC. 35 Ill. Adm. Code 726 Subpart N also provides additional flexibility for manifesting these wastes when they are destined for disposal at such facilities. Although mixed waste meeting the applicable conditions is exempt from certain RCRA requirements, it must still be managed as radioactive waste according to NRC regulations.

As long as Exelon's Dresden Station is in compliance with the conditions specified in 35 Ill. Adm. Code 726 Subpart N, the LLMWs identified as D001, D002, D004 through D042, and F001 through F005 are eligible for conditional exemption from RCRA regulations for Storage, Treatment, Transportation and Disposal.

Please be advised that should Exelon's Dresden Station fail to meet any of the conditions specified in 35 Ill. Adm. Code 726.330, it will automatically lose it's storage and treatment conditional exemption and be subject to the conditions specified in 35 Ill. Adm. Code 726.340 (i.e., waste that failed conditions must be managed as a RCRA hazardous waste and the storage unit storing the LLMW becomes subject to RCRA hazardous waste container storage requirements.). Procedures for reclaiming a lost storage and treatment conditional exemption are specified in 35 Ill. Adm. Code 726.345.

Likewise, should Exelon's Dresden Station fail to meet any of the conditions specified in 35 Ill. Adm. Code 726.415, it will automatically lose it's transportation and disposal conditional exemption and be subject to the conditions specified in 35 Ill. Adm. Code 726.455. Procedures for reclaiming a lost transportation and disposal conditional exemption are specified in 35 Ill. Adm. Code 726.460.

In summary, to maintain the conditional exemptions for storage, treatment, transportation and disposal of its LLMW, Exelon's Dresden Station must continue to meet the requirements set forth in 35 Ill. Adm. Code 726 Subpart N. In addition, Exelon's Dresden Station must comply with the requirements of 35 Ill. Adm. Codes 726.350, 726.355, 726.415, 726.420, 726.425, 726.430, 726.435, 726.440, 726.445 and 726.450.

Should you have any questions concerning this matter, please feel free to contact John Riekstins of my staff at 217/524-3309.

Sincerely,

Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:JR/mls/042845s.doc

cc: USEPA Region V -- Harriet Croke
Kevin K. Hersey -- Exelon

RECEIVED

MAR 3 1 2004

Technical Support and Permits Section
Waste Management Branch
Waste, Pesticides and Toxics Division
U.S. EPA - Region 3

Bill USEPA

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

ILD 000 665 489

April 21, 1997

CERTIFIED MAIL
P 344 343 931

Commonwealth Edison Company
Attn: Brian M. McCann
Supervisor of Land Quality
Post Office Box 767 (Room 35, FNW)
Chicago, Illinois 60690-0767

Re: 0630605014 -- Grundy County
ComEd - Dresden Station
ILD000665489
RCRA Part A Permit
Log No. A-490
Received: July 1, 1996; March 24, 1997 and March 25, 1997

Dear Mr. McCann:

The Illinois Environmental Protection Agency (IEPA) has received the following submittals from the Commonwealth Edison Company (ComEd) located at 6500 N. Dresden Road, Morris, Illinois:

- **Submittal dated June 26, 1996 (received July 1, 1996)**
  Request to add additional waste stream codes to Part A Application currently in effect. (Last modified on May 18, 1993).

- **Submittal dated March 13, 1997 (received March 25, 1997)**
  Information regarding waste management practices @ ComEd's **"Mixed Waste** (Container) **Storage Area"**, a 50' X 64' building, permitted for use under interim status on May 18, 1993.

- **Submittal dated March 18, 1997 (received March 24, 1997)**
  Document entitled "TAB - A RCRA CONTINGENCY PLAN FOR THE ON-SITE ACCUMULATION OF HAZARDOUS OR MIXED WASTE: LATEST REVISION: JANUARY 1997", herein known as the "**Contingency Plan**". Appendix 2 contains information on guidelines used by facility to help determine waste compatibility.

The above submittals were reviewed as a request by ComEd to modify the existing RCRA Part A Permit Application for the above referenced facility. Your request to add additional EPA waste codes (D002, D009, D011 through D017, D019 through D028, D030 through D034, D037, D038, D040 through D043, F003 and F004) to the current RCRA Part A Permit Application has been approved subject to the following conditions:

1. Unless specifically modified by this letter, management of hazardous and mixed waste at the above referenced facility shall be accordance with the IEPA's letter dated December 19, 1990 and subsequent modifications to ComEd's Part A permit application.

2. Brian McCann must meet the signatory requirements of 35 IAC 702.126.

3. Only those mixed wastes which have the EPA Hazardous Waste Numbers D001, D002, D004 through D043, and F001 through F005, may be stored in the two (2) Hazardous Waste Container Storage (S01) Areas permitted for storage under interim status.

4. For wastes stored in containers on containment pallets, only compatible waste, as determined by procedures specified in Appendix 2 of the "**Contingency Plan**", may be stored on the same containment pallet. Please be advised that the information contained in Appendix 2 should not be intended to be exhaustive. An owner or operator must, as the regulations require, adequately analyze his wastes so that he can avoid creating uncontrolled substances or reactions of the type listed in Appendix 2, whether they are listed in Appendix 2 or not.

5. Incompatible waste containers must be segregated from other materials or protected from them using a berm, dike or containment wall as required by 35 IAC 725.277.

6. The management of mixed wastes at this facility must be carried out in accordance with the applicable requirements of 35 IAC 702, 703, 705, 721, 722 and 725. This includes the financial assurance requirements of 35 IAC 725, Subpart H.

As specified in 35 IAC 703.150(d), IEPA will in the future request that Part B of the RCRA permit application be submitted for review and approval. At that time, Commonwealth Edison will have six (6) months (minimum) to submit the application. Once received, the IEPA will begin reviewing this application in accordance with the procedures set forth in 35 IAC 705.

Should you have any questions concerning this matter, please feel free to contact John Riekstins of my staff at 217/524-3309.

Sincerely,

Edwin C. Bakowski, P.E
Manager, Permit Section
Bureau of Land

ECB:JR:bjh\972604.WPD
JR-JK
cc: USEPA Region V -- Hak Cho

A.2.3. USEPA

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

May 18, 1993

Commonwealth Edison
Attn: Brian M. McCann
Supervisor of Land Quality
Post Office Box 767 (Room 35, FNW)
Chicago, Illinois 60690-9276

Re: 0630605014 -- Grundy County
Commonwealth Edison -- Dresden Nuclear Power Station
ILD000665489
RCRA Part A Permit
Log Nos. A-465 and A-479
Received: July 6, 1992 and April 29, 1993

Dear Mr. McCann:

The Agency has reviewed your request (submittals dated June 30, 1992 and April 23, 1993) to modify the existing RCRA Part A Permit Application for the above referenced facility located on Lorenzo Road, 4 miles west of I-55 near Morris, Illinois. Your request to 1) increase the process design capacity of the mixed waste storage area from 3,300 gallons to 7,000 gallons, 2) add one (1) additional hazardous waste container storage (S01) area for mixed wastes and 3) add additional EPA waste codes (D004, D005, D006, D007, D010, D018, D029, D035, D036, D039 and F005) to the existing RCRA Part A Permit Application (approved by the Agency on December 19, 1990) has been approved subject to the following conditions:

1. A combined maximum of 7,000 gallons of "mixed wastes" (wastes which are both hazardous and radioactive) may be stored in containers in the storage areas (S01) whose locations are shown in drawing B-01A ("Composite Site Plan Dresden Station Units 1, 2 & 3, Commonwealth Edison Co. Chicago, Illinois") and referred to as "Mixed Waste Storage" of the June 30, 1992 submittal. These designated areas include the approved storage area of the Agency's December 19, 1990 approval letter and the "new" S01 storage area, located in a new 50 ft. x 64 ft. building and described in the June 30, 1992 and April 23, 1993 submittals.

2. Only those mixed wastes which have the EPA Hazardous Waste Numbers D001, D004, D005, D006, D007, D008, D010, D018, D029, D035, D036, D039, F001, F002 and F005 may be stored in the container storage areas (S01) identified above.

3. The RCRA Facility Plan for this facility must be updated to include the new mixed waste building and be available for IEPA inspection upon request.

Printed on Recycled Paper

A.I.3.

4. The management of mixed wastes at this facility must be carried out in accordance with the applicable requirements of 35 IAC 702, 703, 705, 721, 722 and 725. This includes the financial assurance requirements of 35 IAC 725, Subpart H.

As specified in 35 IAC 703.150(b), IEPA will in the future request that Part B of the RCRA permit application be submitted for review and approval. At that time, Commonwealth Edison will have six (6) months (minimum) to submit the application. Once received, the IEPA will begin reviewing this application in accordance with the procedures set forth in 35 IAC 705.

Should you have any questions concerning this matter, please feel free to contact John Riekstins of my staff at 217/524-3309.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

LWE:JR:jr
JR JK
cc: George Hamper, USEPA, Region V

USEPA

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

RECEIVED
WMD RCRA JUN 24 1993
RECORD CENTER

April 12, 1993

Commonwealth Edison
Attn: Brian M. McCann
Supervisor of Land Quality
Post Office Box 767 (Room 35, FNW)
Chicago, Illinois 60690-9276

Re: 0630605014 -- Grundy County
Commonwealth Edison -- Dresden Nuclear Power Station
ILD000665489
RCRA Part A Permit
Log No. A-465
Received: July 6, 1992

Dear Mr. McCann:

The Agency has reviewed your request (dated June 30, 1992) to modify the existing RCRA Part A Permit Application for the above referenced facility located on Lorenzo Road, 4 miles west of I-55 near Morris, Illinois. Additional information must be supplied to the Agency before the Agency can complete its' review of your request to 1) increase the process design capacity of the mixed waste storage area from 3,300 gallons to 7,000 gallons, 2) add one (1) additional hazardous waste container storage (S01) area for mixed wastes and 3) add additional EPA waste codes (D004, D005, D006, D007, D010, D018, D029, D035, D036 and D039) to the existing RCRA Part A Permit Application (approved by the Agency on December 19, 1990). Specifically, the following additional information is required:

1. How the requirements of 35 IAC 725 Subparts A, B, C and I will be met for the proposed new hazardous waste container (S01) storage area, including the requirements for fire-protection.

2. A description of where and how the wastes having new EPA hazardous waste number classifications are generated.

3. How the storage of incompatible wastes (if any) will be addressed.

4. A scaled drawing/layout of the floorspace in the proposed new S01 storage area showing the aisle spacing where the subject wastes will be stored.

5. A discussion/description of the floor surface in the proposed new S01 area, including:

   a. Floor thickness and material of construction.

Printed on Recycled Paper

b. Type of protective coating on floor - if any.

c. Location of any floor drains.

6. A discussion of how drums will be stored in the new S01 area, i.e., directly on the floor surface, on specially designed pallets, will drums be staked, etc. This discussion should include how any spillage or leaks will be addressed/contained.

This information should be submitted at your earliest convenience so that the Agency can complete its review of your proposal. Commonwealth Edison cannot use the proposed additional hazardous waste container storage area until such time as the Agency approves in writing the subject request.

Please be advised that upon the approval of this modification request, the management of mixed wastes at this facility must be carried out in accordance with the applicable requirements of 35 IAC 702, 703, 705, 721, 722 and 725. This includes the financial assurance requirements of 35 IAC 725, Subpart H.

Should you have any questions concerning this matter, please feel free to contact John Riekstins of my staff at 217/524-3309.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

LWE:JR:jr
JR JR
cc: George Hamper, USEPA, Region V

Comm[illegible]ealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

June 30, 1992

RECEIVED
JUL 8 1992
OFFICE OF RCRA
Waste [illegible] Division
U.S. EPA, REGION V

CERTIFIED MAIL

Lawrence W. Eastep, P.E.
Manager - Permit Section
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62794-9276

Subject: RCRA Interim Status Permit Application
Dresden Nuclear Power Station (ILD 000665489)

Dear Mr. Eastep:

Enclosed is a revision to the RCRA Interim Status Application for Dresden Station. This was briefly discussed with Mr. Jim Moore of your staff on June 29, 1992.

The revision basically involves an increase to the process design capacity of the mixed waste storage area, an additional mixed waste storage area as well as additional EPA waste codes.

Please make the following changes in the three-ring binder containing the Part A of the RCRA Permit Application for Dresden Station:

1. Replace the permit application (behind Permit Application Tab) with the enclosed revised permit application.

2. Replace the facility drawing under tab Attachment 3 with the enclosed revised facility drawing.

3. Add the enclosed photographs of the additional mixed waste facility behind tab Attachment 4.

While conducting an investigation of the station's environmental status, additional potential mixed waste was generated or identified. We are in the process of sampling for final classification. As a result, our present permitted facility is nearly filled to capacity and does not lend itself to conducting proper sampling and storage. Part A of the RCRA Permit Application has also been revised to reflect new waste codes. The revision in the permit also includes a conversion of a site structure into a storage building which when approved will assure complete and proper storage and sampling of all mixed waste and potential mixed waste. Attachment 3 shows the location of the proposed second mixed waste storage building. Attachment 4 includes a photograph of the second mixed waste building.

We request your approval of the storage capacity change in accordance wtih 35 IAC 703.155(b). This revision is necessary because of a nationwide lack of available treatment, storage and disposal capacity for mixed waste. Originally the Martinsville Low-level Radioactive Waste Facility was to be opened on January 1, 1993, but the date has been delayed. Another facility, Diversified Scientific Services Inc. (DSSI) of Kingston, Tenn can handle only mixed waste in the liquid form. DSSI has been contracted to dispose of Dresden's liquid mixed waste, however DSSI is having unexpected maintenance problems. Regardless when DSSI corrects their problems, Dresden Station will still have some mixed waste that can not be disposed of in the near future.

We appreciate your assistance and cooperation in this regard. If you have any questions or have need of further information, please call me at 312/294-4440 or Sandra Sidhu of my staff at 312/294-4453.

Sincerely,

Brian M McCann

Brian M. McCann
Supervisor of Land Quality

3933o
SP:BMM:bg

cc: George J. Hamper, USEPA
Jim Moore, IEPA (w/o att.)

Com[illegible]ea[illegible] Edison
72 We[illegible] s S[illegible]t, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

October 4, 1982

RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690-3587
Attn: Karl J. Klepitsch, Chief
Waste Management Branch

Subject: Improper Notification of TSD Activity
Facility I.D. Number: ILD 000665489

Dear Mr. Klepitsch:

In response to your letter of September 28, 1982 we wish to inform you that Commonwealth Edison's Dresden Station in Morris, Illinois, U.S. EPA's Facility I.D. Number ILD 000665489 is not in fact a hazardous waste treatment, storage or disposal (TSD) facility. This facility was erroneously identified as a TSD facility on this facility's notification of hazardous waste activity. Because this facility is not a TSD, we will not be submitting a Part A application.

Should you have any questions regarding this matter, please call Angela Jankousky of my staff at 312/294-4458.

Sincerely,

Thomas E. Hemminger

Thomas E. Hemminger
Director of Water Quality

0599E
ALJ:TEH:pp

Commonwealth Edison Company
125 South Clark Street
P.O. Box 767
Chicago, IL 60690-0767

cc. Maywood

Bill

A-490

March 18, 1997

MAR 24 1997

Mr. Jerry Kuhn
Illinois Environmental Protection Agency
Bureau of Land, Division of Land Pollution Control
Permits Section
2200 Churchill Road
Springfield, Illinois 62794-9276

Subject: Copy of RCRA Facility Plan for ComEd's Dresden Station
(IEPA I.D. # ILD 000 665 489)

Reference: Illinois EPA Log No. A-490

Dear Mr. Kuhn:

As requested, Commonwealth Edison (ComEd) is submitting a copy of the RCRA Facility Plan for Dresden Station for the Agency's records.

If you have any questions regarding the submittal, please contact Grayce Majewski of my staff at (312) 394-4453.

Sincerely,

David Rubner for,

Brian M. McCann
Supervisor of Land Quality

GLM:BMM:bg\21-dperm.doc

TAB - A RCRA CONTINGENCY PLAN

FOR THE

ON-SITE ACCUMULATION OF HAZARDOUS OR MIXED WASTE

LATEST REVISION: JANUARY 1997

RECEIVED
MAR 24 1997
PERMIT SECTION

INFORMATION ONLY

Hazardous wastes from Dresden Station are generated as a result of laboratory analysis, replacement of spent products, or routine operation and maintenance activities. Under RCRA, wastes are defined as hazardous if they are listed as such or if they exhibit a hazardous characteristic of corrosivity, ignitability, reactivity or toxicity. Dresden Station may, on an infrequent basis, generate hazardous or mixed waste. A mixed waste is a hazardous waste which is also considered to be low level radioactive. When a waste is generated, the Environmental Services Department (ESD) is contacted to assist in determining the proper disposal method. A sample of the waste may be analyzed by the System Materials Analysis Department (SMAD) using the Request for Analysis and Disposal of Waste form (See Attachment B-4) or analyzed by other off-site laboratories, as required. For small quantities, the waste disposal contractor contracted by ESD may sample, analyze and package the material for disposal.

Currently, there is very limited disposal capacity for mixed waste. Therefore, mixed waste must be stored on-site until disposal capacity becomes available. The mixed waste storage area is operated and maintained in accordance with the interim status guidelines (35 IAC 725).

INFORMATION ONLY

F. Management of Containers

A container holding hazardous or mixed waste remains closed during storage, except when it is necessary to add or remove waste in accordance with Section 725.273 (refer to Section G, Inspections).

Precautions taken during the opening, handling or storage of waste containers to prevent the container from rupturing or leaking are:

- Containers are handled in an upright position.
- Containers are stored away from direct heat sources (i.e., flame sunlight).
- Access to waste is through prescribed opening (e.g., bunghole, lid).
- Containers which are not completely sealed when closed are considered to be in poor or deteriorating condition and are replaced. However, wastes such as oils or solvents should be vented as necessary in an approved location, to prevent bulging or swelling.

G. Inspections

Areas where hazardous or mixed waste is stored are inspected and documented weekly to check for drum leaks and drum deterioration (use Appendix 1: Hazardous or Mixed Waste Container Inspection Log or equivalent).

H. Inspection Schedule

This inspection schedule is designed to meet applicable regulatory requirements of 40 CFR 725.115 for the station due to its present interim status. Specifically, Section 725.111 a)1) states that the Station... "shall develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting or responding to environmental or human health hazards."

I. Special Requirements for Ignitable Waste

Containers holding ignitable waste are located at least 15 meters (50 feet) from the facility's property line (Section 725.276). To prevent the accidental ignition of ignitable waste, the waste is separated and protected from sources of ignition including, but not limited to:

- Open Flames
- Smoking
- Cutting and Welding
- Hot Surfaces
- Frictional Heat
- Sparks (static, electrical, or mechanical)
- Spontaneous Ignition (heat-producing chemical reactions)
- Radiant Heat

INFORMATION ONLY

II. Preparedness and Prevention

A. Introduction

This section is prepared pursuant to the requirements of 35 IAC 722.134 (a)(4) and 35 IAC 725 Subpart C. The objective of this Plan is to minimize the possibility of a fire or explosion, or an unplanned release of hazardous or mixed waste which could present a threat to human health or the environment.
Listed below is the station equipment which may be required during implementation of this plan.

B. Required Equipment (725.132)

The following equipment is available on-site:

1. Communication System
2. Fire Prevention Equipment
3. Spill Control Equipment and Materials
4. Water Supply (at adequate volume and pressure to supply water hose streams or foam producing equipment, automatic sprinklers, or water spray systems)

A description of the above equipment may be found in Section III.E.3 of the Contingency Plan and Emergency Procedures as required by Section 725.152.

C. Access to Communications or Alarm System

Personnel involved in handling hazardous wastes at Dresden Station have direct access to a telephone. In the event of an emergency, station personnel would have immediate access to this communications device.

Telephones can access the Dresden Station Emergency line - this extension is a direct line to the station Control Room and has been reserved for emergency use only. All station personnel have been trained to the use of this emergency extension. Two-way radios are also available to provide communications with the station Control Room and the Shift Manager's office.

D. Required Aisle Space

Sufficient aisle space, a minimum of two (2) feet, is maintained to allow the unobstructed movement of personnel, fire protection equipment, and spill control equipment to any area of waste accumulation (Section 725.135).

E. Arrangements with Local Authorities

Dresden has in place local fire, police, hospital and ambulance agreements (Attachment 1) to provide services as necessary as part of the Generating Station Emergency Plan. ComEd also has contracted the services of a professional hazardous materials emergency response company.

INFORMATION ONLY

III. Contingency Plan and Emergency Procedures

A. INTRODUCTION

This section is prepared pursuant to the requirements of 35 IAC 722.134 (a)(4) and 35 IAC 725 Subpart D. The objectives of this sections are to minimize hazards to human health or the environment from fires, explosions, or unplanned releases of hazardous or mixed waste to the environment.

B. APPLICABILITY OF OSHA REQUIREMENTS

Where a facility conducts both hazardous waste operations and also handles other hazardous substances defined in 29CFR 1910.120, the requirements of 29CFR 1910.120(q) apply.

C. Copies of Contingency Plan

Copies of the Contingency Plan must be maintained at Dresden Nuclear Power Station and at the following locations listed below:

1. RCRA Emergency Coordinator
2. RCRA Alternate Emergency Coordinator
3. Shift Manager
4. Safety and Loss Prevention
5. Environmental Services (General Office)
6. Training Supervisor
7. Technical Support Center
8. Central File
9. Grundy County Sheriff's Office
10. Coal City Fire Department
11. Morris Hospital
12. Illinois Emergency Management Agency

D. AMENDMENT OF CONTINGENCY PLAN

The Contingency Plan must be reviewed and amended as necessary, whenever:

1. Applicable regulations are revised (Environmental Services).
2. The Plan fails in an emergency (Dresden Station).
3. Dresden Station changes in a way that materially increases the potential for fires, explosions or releases of hazardous or mixed waste, to which the station and/or the local agencies could not adequately respond, or drastically effects the response necessary in a emergency (Dresden Station).
4. The Primary Coordinator or the Back-up Coordinator changes (Dresden Station).
5. The list or location of emergency equipment in the Hazmat Pre-Incident Plan changes (Dresden Station).
6. The financial assurance letter from the Chief Financial Officer is reevaluated annually and will be amended in the plan for the station by Environmental Services.

INFORMATION ONLY

The following person is the RCRA Primary Emergency Coordinator for Dresden Generating Station:

Don Rink

Work Address:
Dresden Station
6500 North Dresden Road
Morris, Il. 60450
Work Phone No: 815/942-2920
Ext. 2641

Home Address:
Non responsive
Non
Home Phone No: Non responsive

b) The following person is the alternate for the position of RCRA Primary Emergency Coordinator, and assumes responsibility as such:

Lance Germani

Work Address:
Dresden Station
6500 North Dresden Road
Morris, Il. 60450
Work Phone No: 815/942-2920
Ext. 2336

Home Address:
Non
Non
Home Phone No. Non responsive

c) The following positions, which are manned 24 hours per day / 7 days per week, are alternates for the position of RCRA Emergency Coordinator, and assume responsibility as such:

Safety and Loss Prevention / Hazmat Incident Commander
Dresden Station
6500 North Dresden Road
Morris, Il. 60450
815/942-2920
Ext. 3377 / 2679 Beeper 118

Shift Manager
Dresden Station
6500 North Dresden Road
Morris, Il. 60450
815/942-2920
Ext. 4002 (Unit 2) / Ext. 4003 (Unit 3)

d) Dresden Station maintains a dedicated on-site HAZMAT team whose personnel have received training in hazardous materials emergency response. Station emergency response personnel are trained in first aid, CPR and rescue for assisting injured personnel. Local ambulance services will provide transportation for injured personnel to Morris Hospital in Morris, Illinois.

e) If there is a release, fire or explosion involving hazardous waste, the RCRA Emergency Coordinator, in coordination with station technical and operating personnel, will identify the character, exact source, amount and area extent of released materials. The RCRA Emergency Coordinator may do this by observation or review of facility records or manifests and, if

INFORMATION ONLY

j) Following the emergency, the root cause is determined and action is taken to prevent reoccurrence.

k) The above actions must be written in a report form and submitted by Environmental Services to the Directors of the IEPA and the USEPA within 15 days of the incident. This report must include the information listed in Attachment A-1, Emergency Report Information.

3. EQUIPMENT

a) Communications

1) Radios

Two-way radios are available to station personnel responsible for hazardous waste generation, or storage areas and are used as required. These radios provide necessary communications with the station Control Room and Shift Manager's Office.

- OR -

2) Telephones & Beepers

Dresden Station Ext. 2211 is a direct line to the station Control Room and has been reserved for emergency use only. All station personnel have been trained on the use of the 2211 emergency number. The Shift Manager can be reached at Ext. 4002 for Unit 2 or 4003 for Unit 3, or by beeper.

b) Fire Prevention

1) Fire Fighting Response

The Station Fire Fighting Response Team consists of the Safety and Loss Prevention Support Technicians and Supervision. All appropiate Safety and Loss Prevention personnel receive quarterly training in fire fighting.

2) Fire Extinguishers

Fire extinguishers are of the CO_2, dry powder, or water type. CO_2 type fire extinguishers are applicable for Class B and C fires. Dry powder type are applicable for Class B fires. Water type are applicable for Class A fires. For a list of fire extinguisher locations, refer to the Station Procedure DFPS-4114-04 "Portable Fire Extinguisher Inspection and Maintenance".

c. Self-Contained Breathing Apparatus (SCBA)

This equipment provides approximately twenty minutes of contained air supply to the wearer. Refer to NGET Annual Training.

INFORMATION ONLY

ATTACHMENT A-1, EMERGENCY REPORT INFORMATION

The following information will be required by Environmental Services:

1. Name and address of facility. Include name of RCRA Emergency Coordinator.
2. Type of Incident (explain)
3. Name of the person who writes the report and their phone number.
4. Name of the on-site person who can be contacted and their phone number.
5. Date, time and location of incident, including name of water body involved, if any.
6. Extent of injuries.
7. Type and quantity of material involved.
8. Cause of spill, incident or violation--brief summary.
9. An assessment of actual or potential hazards to human health or the environment, where this is applicable.
10. Estimated quantity and disposition of recovered material from the cleanup of the incident.
11. Precautionary measures being taken and the action to be followed to remedy the situation.
12. Agencies which have been notified, including date and time of notification. Name of the person notifying the Agencies.
13. Other pertinent information.

INFORMATION ONLY

ATTACHMENT A-2, DRESDEN STATION HAZARDOUS WASTE MANAGEMENT TRAINING

I. Training for Emergency Response

This training is designed to ensure that personnel are prepared to respond to emergency situations and is part of the training provided to employees in the use of station procedures to support the GSEP and Hazmat programs. Training elements addressing emergency response situations involving hazardous waste include:

- Emergency communications
- Response to fires
- Notifications
- Procedures for shutdown affected equipment
- Procedures for emergency equipment

II. Training for Hazardous or Mixed Waste Management

Training in the use of appropriate station procedures which involve management of hazardous or mixed waste is provided by Station personnel to the appropriate individuals. This training is provided annually to the appropriate personnel in the Continuous Training modules.

III. Additional Training for Hazardous Waste Management

Training on changing RCRA requirements is provided to the Station RCRA Compliance Coordinator by the appropriate Environmental Services contact. This training is provided on an as needed basis.

INFORMATION ONLY

DATA SHEET

HAZARDOUS WASTE STORAGE FACILITY
WEEKLY INSPECTION FORM

Week of:_____ Inspector:_____

Fill in applicable information below.

1	Name of Storage Location:	**HAZARDOUS WASTE STORAGE FACILITY**		
2	Communication System functioning properly? Describe System: **Phone - Pager - Radio**	☐ YES	☐ NO**	☐ Comments
3	Water available at adequate volume and pressure? Describe System: **Site F.P. System**	☐ YES	☐ NO**	☐ Comments
4	Fire Extinguisher Inspection current?	☐ YES	☐ NO**	☐ Comments
5	Lighting adequate?	☐ YES	☐ NO**	☐ Comments
6	Temperature acceptable?	☐ YES	☐ NO**	☐ Comments
7	Spill Equipment available?	☐ YES	☐ NO**	☐ Comments
8	Physical Condition of Facility acceptable (check berms, sumps, etc.)	☐ YES	☐ NO**	☐ Comments
9	Facility Door Lock functioning properly?	☐ YES	☐ NO**	☐ Comments
10	Corrective Actions required?	☐ YES**	☐ NO	☐ Comments

Comments:_____

_____

_____

_____

_____

_____

INFORMATION ONLY

DATA SHEET

MIXED WASTE STORAGE FACILITY
WEEKLY INSPECTION FORM

Week of:_____ Inspector:_____

Fill in all information below.

1	Name of Storage Location	MIXED WASTE STORAGE FACILITY		
2	Number of Containers stored at this location			
3	Total Volume of Containers (gallons)			
4	Container(s) properly labeled as Mixed Waste?	☐ YES	☐ NO**	☐ Comments
5	Container(s) in Good Condition?	☐ YES	☐ NO**	☐ Comments
6	Container(s) Leaking?	☐ YES**	☐ NO	☐ Comments
7	Container(s) completely Closed?	☐ YES	☐ NO**	☐ Comments
8	Communication System functioning properly? Describe System: **Phone - Pager - Radio**	☐ YES	☐ NO**	☐ Comments
9	Water available at adequate volume and pressure? Describe System: **Site Fire Protection Systems**	☐ YES	☐ NO**	☐ Comments
10	Fire Extinguisher Inspection current?	☐ YES	☐ NO**	☐ Comments
11	Adequate Lighting?	☐ YES	☐ NO**	☐ Comments
12	Temperature acceptable?	☐ YES	☐ NO**	☐ Comments
13	Secondary Spill Containment empty of material?	☐ YES	☐ NO**	☐ Comments
14	Spill Equipment available?	☐ YES	☐ NO**	☐ Comments
15	Physical Condition of Facility acceptable (check berms, sumps, etc.)	☐ YES	☐ NO**	☐ Comments
16	Facility Door Lock functioning properly?	☐ YES	☐ NO**	☐ Comments
17	Corrective Actions Required?	☐ YES**	☐ NO	☐ Comments

Comments:_____

** IMMEDIATELY NOTIFY RCRA Coordinator/designee. COMPLETE the following or mark N/A if not applicable. ☐ N/A

DRUM I.D. NUMBER	CORRECTIVE ACTION	DATE COMPLETE/ INITIAL

Signature:_____ Date/Time:_____

Potentially Incompatible Wastes

Many hazardous wastes, when mixed with other wastes or materials, can produce effects which are harmful to human health and the environment such as: 1) heat or pressure, 2) fire or explosion, 3) violent reaction, 4) toxic dusts, mists, fumes or gases, or 5) flammable fumes or gases.

Below are examples or potentially incompatible wastes, waste components, and materials, along with the harmful consequences which result from mixing one group of materials with another. The list is intended as a guide to indicate the need for special precautions when managing these potentially incompatible wastes or components.

This list is not intended to be all-inclusive. Wastes are analyzed to avoid creating uncontrolled substances or reactions of the type indicated, whether they are specifically listed below or not.

It is possible for potentially incompatible wastes to be mixed in such a way that precludes a reaction (for example, adding water to acid rather than acid to water) or that neutralizes them (for example, a strong acid mixed with a strong base), or that controls substances produced (for example, by generating flammable gases in a closed tank equipped so that ignition can not occur).

In the lists below, the mixing of a Group A material with a Group B material may result in the potential consequence as noted:

GROUP 1-A	GROUP 1-B
Acetylene sludge Alkaline caustic liquids Alkaline cleaner Alkaline corrosive liquids Alkaline corossive battery fluid Caustic wastewater Lime sludge & other corrosive alkalies Lime wastewater Line and water Spent caustic	Acid sludge Acid and water Battery acid Chemical cleaners Electrolyte, acid Etching acid liquid or solvent Pickling liquor & other corrosive acids Spent acid Spent mixed acid Spent sulfuric acid
Potential consequences: Heat generation, violent reaction.	

GROUP 2-A	GROUP 2-B
Aluminum Beryllium Calcium Lithium Magnessium Potassium Sodium Various Metal Powders Other reactive metals & metal hydrides	Any waste in Group 1-A or 1-B
Potential consequences: Fire or explosion, generation of flammable hydrogen gas.	

GROUP 3-A	GROUP 3-B
Alcohols Water CH_3SiCl_3	Any concentrated waste in Groups 1-A or 1-B Calcium Lithium Metal hydrides Potassium SO_2, Cl_2, $SOCl_2$, PCl_3
Potential consequences: Fire, explosion or heat generation; generation of flammable or toxic gases.	

GROUP 4-A	GROUP 4-B
Alcohols Aldehydes Halogenated hydrocarbons Nitrated hydrocarbons Unsaturated hydrocarbons Other reactive organic compounds and solvents	Concentrated Group 1-A or 1-B wastes
Potential consequences: Fire, expolsion, or violent reaction.	

GROUP 5-A	GROUP 5-B
Spent cyanide and sufide solutions	Group 1-B wastes
Potential consequences: Generation of toxic hydrogen sutide gas and hydrogen cyanide.	

GROUP 6-A	GROUP 6-B
Chlorites Chlorine Chromic acid Hypochlorites Nitrates Nitric acid, fuming Perchlorates Permanganates Peroxides Other strong oxidizers	Acetic acid & other organic acids Concentrated mineral acids Group 2-A wastes Group 4-A wastes Other flammable & combustible wastes
Potential consequences: Fire, explosion, or violent reaction.	

Source: "Law, Regulations, and Guidelines for Handling of Hazardous Waste." California Department of Health, February, 1975.

INFORMATION ONLY

TAB B - SAMPLING DETAIL AND WASTE ANALYSIS PLAN

INFORMATION ONLY

B. Documentation

Labeling

Each waste container sampled and the sample jar used containing a representative of that waste must have identical stick-on labels. These labels must have the following information on it.

Collector _____
Sample No. _____
ComEd Facility _____
Place of Collection _____
Date Sampled _____
Time Sampled _____
Comments _____

See example of a label in Attachment B-1.

Container Marking

Each container sampled must (in addition to the stick-on label) have its sample number marked on it with a non-erasable marker, i.e. grease marker for an oily drum, or indelible ink pen or plastic or fiber bag containers.

Sample Numbering

Samples obtained must be numbered sequentially starting with one. Each sample number must be prefixed with the stations letter identification, i.e. DR=Dresden, LS=LaSalle, QC=Quad Cities, BW=Braidwood, BY=Byron, ZN=Zion.

Sample numbers are applied to the sample labels, container labels, container markings, sample profile sheets and chain of custody forms.

Log Book

A log book must be maintained on site. The log book should be of three ring binder type allowing for insertion of material. The log book should be divided into at least two sections, one section for this procedure and a second section for completed waste information sheets (if required) for each waste sampled.

Waste Information Sheet

The waste information sheet must be completed for each waste sampled and must be made available to commercial laboratories and regulatory personnel upon request. The information recorded on each sheet must be completed at the time the waste is actually sampled. See example of profile sheet in Attachment B-2.

Sampling for purposes other than establishing waste identity or characterization do not require a waste information sheet and may use other sampling procedures or techniques deemed suitable by the Environmental Services Department, Waste Broker or the Waste Products Chemist.

INFORMATION ONLY

Solids in drums - powder or friable

Powdered and/or friable solids may be sampled representatively using a coring tool. Three separate samples from one individual drum should be obtained if possible. One from the lower third, the middle third, and the top third of each drum. Each third of sample is combined into one sample jar to represent the waste in the drum.

Solids in other containers

Solids in bags must be sampled by obtaining several grab samples representing different areas of the bag.

Foreign objects in the waste

If such items as trash paper, cardboard, wood, metal objects, aluminum cans, or other materials typically considered as trash and foreign to the waste being sampled are found in a drum then those items must be dealt with in one of two ways.

- If there are only a few such foreign items, and they can be easily extracted from the waste then they should be extracted and handled as LSA Radwaste and not mixed waste.
- If the foreign items cannot be extracted from the waste to be sampled then the presence of those foreign items must be noted on the waste profile form as part of the waste stream name and noted in the comment section. For example:

  Waste name: Demineralizer resin and paper debris
  Comment: Waste contains embedded paper waste.

Sampling Techniques

Care must be taken to prevent cross contamination from one sample to another. The following precautions will be taken, to prevent misrepresentation of wastes:

- All personnel sampling waste must wear disposable gloves.
- Glass tubes must be used only once per waste sampled.
- Coring tubes used to sample solids must be de-contaminated before reuse. Decontamination can be as simple as wiping off waste residue with a rag or water.

Sampling Procedures

Refer to Station procedure DCP 1019-01 "Sampling".

INFORMATION ONLY

II. WASTE ANALYSIS PLAN

This plan is written to meet the hazardous waste determination and analysis requirements of 35 IAC 722 and 725, specifically refer to Sections 722.111 and 725.113.

A. Mixed Waste

The Station presently stores mixed waste due to the lack of available treatment capacity. However, the Station does not treat or dispose of mixed waste on site. Mixed waste is sampled, classified and managed in accordance with Station procedure. The Mixed Waste Facility Operating Log documents this information.

B. Hazardous and Non-hazardous Waste

Hazardous waste, exclusive of mixed waste, is not treated, stored or disposed on site. Determination as to the hazardous or non hazardous nature of a waste is made at the Station with the assistance of the Environmental Services Department as needed. Proper disposal of hazardous waste generated at the Station is arranged primarily through a contracted waste broker or vendor.

Waste profile sheets and supplementary information which are prepared by the hazardous waste disposal contractor and then reviewed and signed by the Station serve as a baseline for quality control of the waste. This information is available for review through the RCRA Emergency Coordinator, ESD and the waste disposal contractor. Waste analyses and new or revised waste profile sheets are completed as necessary if the waste generating process changes or waste quality exceeds the waste profile tolerances. Also, waste analyses and profiles are completed per request of the disposal facility(ies).

Non-hazardous wastes which meet the definition of special waste are managed pursuant to 35 IAC 808 and 809. Special waste permits at local landfills and the profile sheets associated with the waste are filed in the control of the RCRA Emergency Coordinator.

INFORMATION ONLY

WASTE STREAM INFORMATION FORM

WASTE SAMPLE # DR

SITE ADDRESS
ComEd - DRESDEN
6500 NORTH DRESDEN ROAD
MORRIS , ILLINOIS 60450

US EPA ID # ILD00665439

IL. EPA ID # 0630605014

WASTE STREAM NAME _____

WASTE LOCATION WITHIN FACILITY _____

SAMPLING INFORMATION

SAMPLER _____
DATE SAMPLED _____ *TIME* _____
WITNESS _____
FACILITY CONTACT DON RINK *PHONE* 815-942-2920 EXT. 2641

WASTE CONTAINER INFORMATION

TYPE	CONSTRUCTION	QTY / SIZE OF CONTAINER	CONDITION OF CONTAINER
( ) DRUM	( ) STEEL		( ) GOOD
( ) BAG	( ) PLASTIC	_____	( ) LEAKING
( ) PAIL	( ) FIBER		( ) TORN
( ) OTHER	( ) OTHER	_____	( ) OTHER
_____	_____		_____

VOLUME OF WASTE SAMPLED _____
SAMPLE OBTAINED BY _____

WASTE DESCRIPTION

PHYSICAL STATE	PHASES	ODOR	VISCOSITY
( ) SOLID	( ) 1 LAYER	( ) NONE	( ) LOW (WATER)
( ) LIQUID	( ) 2 LAYERS	( ) MILD	( ) MEDIUM (OIL)
( ) SEMI-SOLID	( ) ____ LAYERS	( ) STRONG	( ) HIGH (GREASE)
( ) POWDER			

DRUM IDENTIFICATION NUMBER(S) _____

COMMENTS _____

1883

PRESS HARD - USE BALL POINT PEN

REQUEST FOR ANALYSIS AND DISPOSAL OF WASTE

Priority

STATION/DIVISION _____

NAME OF WASTE _____ REGULATORY CLASSIFICATION _____

SECTION ONE — ENVIRONMENTAL SERVICES (ESD)

STATION/DIVISION CONTACT:

Extension: Department:

ESD CONTACT:

PROPOSED METHOD OF DISPOSAL

- ☐ Landfill
- ☐ Land Application
- ☐ Treatment
- ☐ Incineration
- ☐ Recycle
- ☐ Resale
- ☐ Secondary Fuel
- ☐ _____

DISPOSAL FACILITY:

ALTERNATE FACILITY:

PROTOCOL:

- ☐ RCRA
- ☐ UST
- ☐ CERCLA

ANALYSIS REQUIRED BY:

ANALYSIS REQUIRED:

- ☐ GREEN SHEET
- ☐ LAND APPLICATION
- ☐ OIL SREENING
- ☐ WASTE OIL (Full Analysis)
- ☐ GENERIC PERMIT _____
- ☐ HAZARDOUS WASTE DETERMINATION
- ☐ CONSTRUCTION DEBRIS CLASSIFICATION
- ☐ OTHER _____

SPECIAL INSTRUCTIONS:

SECTION TWO—STATION/DIVISION

SAMPLED BY: _____ DATE: _____

SUBMITTED BY: _____ EXT.: _____

DATE SUBMITTED: _____ FUNCTION #: _____

DISPOSAL REQUIRED BY (Date) _____

LIST SOURCE(S) OF WASTE: _____

DESCRIBE HOW WASTE IS STORED

(i.e., TANKS, BAGS/DRUMS NO. & SIZE, PILE, POND, DUMPSTER, SPILL TO GROUND)

ESTIMATE QUANTITY TO BE DISPOSED

- ☐ SOLIDS _____ CUBIC YARDS
- ☐ LIQUIDS _____ GALLONS

IS WASTE KNOWN TO BE CORROSIVE? ☐ YES ☐ NO

IS WASTE KNOWN TO BE FLAMMABLE? ☐ YES ☐ NO

IS WASTE KNOWN TO CONTAIN PCB'S? ☐ YES ☐ NO

IS WASTE KNOWN TO CONTAIN CHLORINATED SOLVENTS (i.e., EDISON SOLVENT)? ☐ YES ☐ NO

DOES A MATERIAL SAFETY DATA SHEET EXIST FOR ORIGINAL MATERIALS? (IF YES, PLEASE ATTACH) ☐ YES ☐ NO

WASTE DESCRIPTION (CHECK AS MANY BOXES AS NECESSARY)

PHYSICAL STATES	PHASES	ODOR	VISCOSITY
☐ SOLID	☐ ONE LAYER	☐ NONE	☐ LOW (WATER)
☐ LIQUID	☐ TWO LAYER	☐ MILD	☐ MEDIUM (OIL)
☐ SEMI-SOLID	☐ _____ LAYERS	☐ STRONG	☐ HIGH (GREASE)
☐ POWDER			

If Multiple Layers, Estimate Volume %'s _____

DESCRIBE HOW SAMPLE WAS OBTAINED: _____

SECTION THREE—SYSTEM MATERIALS ANALYSIS (SMAD)

SAMPLE RECEIVED _____

RECEIVED BY _____

NUMBER OF SAMPLES _____

PROPER SAMPLE CONTAINERS USED? _____

JOB NUMBER _____

REPORT NUMBER _____

REPORT APPROVED _____

WORK COMPLETED ON _____

LAB COMMENTS:

86-4848 6-90

SMAD

INFORMATION ONLY

USEPA

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: 0630505014 -- Grundy County
Commonwealth Edison-Dresden Nuclear Power Station
ILD000665489
Compliance File

January 7, 1992

Commonwealth Edison
Attn: Judy Freitag
72 West Adams Street
Post Office Box 767
Chicago, Illinois 60690-0767

Dear Ms. Freitag:

The Agency is in receipt of your November 27, 1991 response(s) to our November 12, 1991 Compliance Inquiry Letter. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 724.251 is now considered resolved.

If you have any questions, please contact Andrew Vollmer at 217/782-6761.

Sincerely,

Brian S. White, Manager
Compliance Unit
Planning and Reporting Section
Division of Land Pollution Control

BSW:AV:LS:rlc/17r,14

cc: Division File
Maywood Region
USEPA Region V
Andrew Vollmer
Bill Ingersoll
Lizz Schwartzkopf

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF HAZARDOUS WASTE
One Winter Street
Boston, Massachusetts 02108

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator US EPA ID No. / Manifest Document No.	ILD000665489 1Z60214
2. Page 1 of	1
Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address	Commonwealth Edison – Dresden Station, Lorenzo Road, Morris, Il 60450
4. Generator's Phone	815 942-2920
A. State Manifest Document Number	MA C887831
B. State Gen. ID	Il # 1630605014
5. Transporter 1 Company Name	Clean Harbors of Kingston, Inc
6. US EPA ID Number	MAD053132250
C. State Trans. ID	DT P0419
D. Transporter's Phone	(617) 585-5111
7. Transporter 2 Company Name	
8. US EPA ID Number	
E. State Trans. ID	
F. Transporter's Phone	
9. Designated Facility Name and Site Address	Clean Harbors of Natick, Inc. 10 Mercer Road Natick, MA 01760
10. US EPA ID Number	MAD980523203
G. State Facility's ID	Not Required
H. Facility's Phone	(508) 655-8863

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste Flammable Liquid, N.O.S. Flammable Liquid UN1993	001	DM	00065	G	D001
b. Waste Poisonous Solid, N.O.S. Poison B UN2811	002	DF	00110	G	P105
c. Hazardous Waste, Liquid, N.O.S. ORM-E NA 9189	009	DF	00045	G	U226
d.					

J. Additional Descriptions for Materials Listed Above *(include physical state and hazard code.)*		K. Handling Codes for Wastes Listed Above	
a. Lab Quantities 1X5	c. Lab Quantities 9X5	a.	c.
b. Lab Quantities 2X5	d.	b.	d.

15. Special Handling Instructions and Additional Information
In case of emergency call (312) 646-6202

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Date Month Day Year
[illegible]	[illegible]	

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
JOE PERRONKO	[signature]	05 17 90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

MA C887831 COPY>7: GENERATOR MAILS TO GENERATOR STATE

Form Approved OMB No. 2050-0039, Expires 9-30-91
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY>7: GENERATOR MAILS TO GENERATOR STATE

1773

Date: 5-9-90

RECEIVED
WMD RCRA
RECORD CENTER
2-22-93

Comp 1

RECEIVED
MAY 11 1990
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

To: Valdas V. Adamkus
Regional Administrator
USEPA
237 S. Dearborn Street
Chicago, Ill. 60604

MAC887831

Re: Soft Hammer Demonstration and Certification for

Name: Commonwealth Edison - Dresden EPA ID No.: ILD 000 665 489

Address: Lorenzo Road

Morris, Il 60450 Phone No.: (815) 942-2920

Dear Sir:

The Land Disposal Restrictions (40 CFR Part 268) prohibit the land disposal of listed hazardous wastes which do not meet treatment standards specified by the US EPA. 40 CFR 268.8(a) requires generators of "soft-hammer" wastes (First- and Second-Third wastes for which no treatment standard has yet been established) to:

(1) Make a good faith effort to locate and contract with treatment and recovery facilities which use the practically-available technology which yields the greatest environmental benefit, and

(2) Submit appropriate documentation of that effort to the EPA Regional Administrator.

This letter is intended to serve as a soft-hammer demonstration and certification for the following waste streams:

EPA Waste Code & Description	EPA Waste Code & Description	EPA Waste Code & Description
P105-Sodium azide		
U226-1,1,1-trichloroethane		

All of the soft-hammer waste streams noted above are "U" or "P" code hazardous wastes which, by definition, are commercial chemical products intended to be discarded. These wastes were generated as the result of a laboratory cleanout operation conducted on our behalf by Clean Harbors of Chicago, Inc. None of the wastes included above are spent solvent (F001-F005) or dioxin (F020-F028) wastes.

Clean Harbors of Natick, Inc. has contacted the following hazardous waste treatment and recovery facilities on our behalf and, based on those inquiries, determined that incineration is the best practically-available treatment method for above-described waste streams. In no case will any of the above-listed wastes (or residues) be disposed or treated in a land disposal unit in excess of the California List prohibition levels.

1. Clean Harbors of Braintree, Inc.
   385 Quincy Avenue
   Braintree, MA 02184 (617) 849-1807
   Contact: Doug Lanich (7/14/89): "All material sent to this facility are organic materials (mostly solvents). This material is blended for incineration which is the best available method of treatment for this material."

2. Trade Waste Incineration
   7 Mobile Avenue
   Sauget, IL 62201 (618) 271-2804
   Contact: Dennis Warchol (7/14/89): "Incineration is the practically available technology which yields the greatest environmental benefit. The waste is principally organic residues which are best destroyed by incineration"

3. ENSCO, Inc.
   American Oil Road
   El Dorado, AR 71730 (501) 223-4160
   Contact: Eva Dodd (7/14/89): "All material is incinerated on site. Incineration is the best-available technology for the destruction of organic material."

4. ThermalKEM
   454 S. Anderson Road
   Rock Hill, SC 29730 (803) 329-9690
   Contact: Nickie Humphries (7/14/89): All material is incinerated on site in a fixed hearth kiln. All ash is sent to secure chemical landfill. Incineration is the best practical treatment technology for the destruction of organic material."

5. Tricil, Ltd.
   1829 Allansport Road
   Thorold, Ont., CANADA (416) 227-7872
   Contact: Gregg Remmelgas (7/14/89): "Material is blended for incineration offsite. Nonincinerables are neutralized and solidified which significantly reduces the toxicity and hazards of that material."

6. CWM/SCA Chemical Services
   11700 S. Stoney Island Avenue
   Chicago, IL 60617 (312) 646-5700
   Contact: Bruce Marti (7/14/89): "The soft-hammer waste that is accepted at this facility is incinerated which is the best-available treatment technology for the destruction of organic material and residues."

Certification

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

DON RINK
Name (Print)

WASTE PRODUCTS CHEMIST
Title

Don Rink
Signature

(IF APPLICABLE)
This soft-hammer demonstration/certification replaces previous notice(s) submitted to EPA on the following date(s):

_____ _____

_____ _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: MAY 04 1994

SUBJECT: Justification for Withholding Executive Summary and Conclusions and Recommendations Sections of the Preliminary Assessment/Visual Site Inspection

FROM: Kevin M. Pierard, Chief
Technical Enforcement Section #1
RCRA Enforcement Branch

RECEIVED
WMD RECORD CENTER
MAY 04 1994

TO: File

The "Executive Summary" and "Conclusions and Recommendations" sections of the Preliminary Assessment/Visual Site Inspection (PA/VSI) are being withheld as enforcement confidential. This decision is based upon the Freedom of Information Act (FOIA) 5 U.S.C. §552. These sections are excluded based on exemptions 5 U.S.C. §552(b)(5), which state that the PA/VSI is a "predecisional, deliberative document" and 5 U.S.C. §552(b)(7)(A), "disclosure could reasonably interfere with enforcement proceedings".

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

RECEIVED
WMD RECORD CENTER
JAN 31 1995

March 31, 1994

Mr. Gary Spedl
Plant Manager
Commonwealth Edison Company
Dresden Station
6500 N. Dresden Road
Morris, IL 60450

Re: Visual Site Inspection
Commonweath Edison
Dresden Station
Morris, Illinois
ILD 000 665 489

Dear Mr. Spedl:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/ Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Matthew J. Ohl for

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Printed on Recycled Paper

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

RECEIVED
WMD RECORD CENTER
MAY 03 1994

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

COMMONWEALTH EDISON
DRESDEN NUCLEAR POWER STATION
MORRIS, ILLINOIS
ILD 000 665 489

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	ILD 000 665 489
Date Prepared	:	March 28, 1994
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032IL2J
Prepared by	:	PRC Environmental Management, Inc. (Robert Geiger)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

contains recycled fiber and is recyclable

CONTENTS

FIGURES

TABLES

ENFORCEMENT
CONFIDENTIAL

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Commonwealth Edison Dresden Nuclear Power Station (Dresden Station) facility in Morris, Grundy County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

This report does not discuss the generation of radioactive wastes which are regulated solely by the Nuclear Regulatory Commission (NRC). Additionally, the units that manage these NRC-regulated radioactive wastes, such as the radioactive waste treatment system and radioactive waste storage areas, are not discussed.

Since November 1, 1990, the facility has tested all hazardous and nonhazardous wastes generated from general maintenance and degreasing operations, excluding waste generated in the Non-Radioactive Wastewater Treatment Plant (WWTP) (SWMU 5) and the Outdoor Sludge Drying Beds (SWMU 6), for radioactivity. Hazardous waste tested to be radioactive waste is referred to as "mixed waste." Mixed waste is a RCRA-regulated hazardous waste. Hazardous waste that has not undergone radioactivity testing is referred to as "potential mixed waste." Nonhazardous waste determined to be radioactive is considered a NRC-regulated radioactive waste.

Between November 1, 1990, and February 7, 1991, hazardous and nonhazardous waste was tested for radioactivity in the SWMUs in which they were managed. The waste was considered potential mixed waste before the radioactivity testing was conducted. Hazardous waste determined to be mixed waste was transferred to the Former Mixed Waste Storage Area (SWMU 7), and hazardous waste determined not to be mixed waste was transferred to the Former Hazardous and Nonhazardous Waste Container Storage Area (CSA) (SWMU 8).

Between February 7, 1991, and May 30, 1993, hazardous and nonhazardous waste was still tested for radioactivity in the SWMUs in which they were managed. The waste was considered potential mixed waste before the radioactivity testing was conducted. Hazardous waste determined to be mixed waste

RELEASED
DATE 11/22/01
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

was transferred to the Former Mixed Waste Storage Area (SWMU 7), however, hazardous waste determined not to be mixed waste was transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2).

Since May 1993, hazardous and nonhazardous waste has been tested for radioactivity in the Mixed Waste CSA (SWMU 1). The waste is considered potential mixed waste before the radioactivity testing is conducted. Hazardous waste determined to be mixed waste remains at SWMU 1, and hazardous waste determined not to be mixed waste is transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). SWMU 1 manages mixed waste for longer than 90 days because no permitted waste disposal facilities accept mixed waste (Commonwealth Edison 1990b).

Facility operations generate the following hazardous wastes from general maintenance and degreasing operations: waste solvents (D001, D006, D007, D008, D010, D018, D029, D035, D036, D039, F002 and F005); waste oils (F002, F005, D001, D006, D008, D018, D029, D036 and D039); chlorinated waste solvent and oil mixture (D032, D033, D042, F001 and F003); waste paint (D001, D030 and D034); lab pack waste (D009); waste ethyl glycol (D027, D032, D034 and D036); nonroutinely generated wastes (D001, D002, D007, D018 and F001); wastewaters (not characterized); and Non-Radioactive Wastewater Treatment Plant (WWTP) sludge. Facility operations also generate oil and grease and miscellaneous nonhazardous wastes. The facility is currently regulated as a large quantity generator that stores waste for greater than 90 days.

The PA/VSI identified the following eight SWMUs and three AOCs at the facility:

RELEASED
DATE 1/22/01
RIN #
INITIALS

Solid Waste Management Units

1. Mixed Waste CSA
2. Hazardous and Nonhazardous Waste CSA
3. Satellite Accumulation Areas (SAA)
4. Oil and Water Separators
5. Non-Radioactive WWTP
6. Outdoor Sludge Drying Beds
7. Former Mixed Waste Storage Area
8. Former Hazardous and Nonhazardous Waste CSA

ENFORCEMENT CONFIDENTIAL

Areas of Concern

1. Oil Contamination Area
2. Diesel Fuel Spill Area No. 1
3. Diesel Fuel Spill Area No. 2

The facility property occupies about 2,500 acres in a mixed rural, agricultural and industrial area. The nearest surface water bodies, the Illinois, Kankakee, and Des Plaines Rivers, are located adjacent to the facility. These rivers are used for navigation, sewage disposal for metropolitan Chicago, and for industrial purposes. Groundwater is the source of all potable water in the vicinity of the facility. The nearest drinking water well is located on site. The nearest sensitive environment is a wetland area located less than 1 mile southwest of the facility.

The facility has a history of documented releases to surface water and on-site soils. On February 27, 1985, an unknown quantity of waste oil spilled to an unidentified river in the vicinity of the facility. On several occasions, a sewage treatment surge tank located on the north side of the facility has overflowed and its contents spilled on the soil. On September 8, 1987, 100 gallons of liquid sulfuric acid spilled to the ground while the sulfuric acid was being transferred from a delivery tank truck to a storage tank. On January 18, 1989, a garbage truck leaked about 30 gallons of hydraulic oil to soil and gravel located on the southwest side of the facility. On August 18, 1989, about 1,000 gallons of sodium hypochlorite spilled from a sodium hypochlorite storage tank to the soil. On August 6, 1990, a transformer located on the west side of the facility ruptured and spilled about 20 gallons of its contents to soil and gravel surrounding the transformer. On November 5, 1990, a sodium hypochlorite storage tank spilled 150 gallons of sodium hypochlorite to the soil. On March 6, 1991, a transformer leaked less than one gallon of oil containing PCBs to concrete surrounding the transformer. On March 13, 1991, a 5,800-gallon sodium hypochlorite storage tank located near the water intake structure on the north side of the facility spilled its contents to the ground, snow, and pavement in the area of the storage tank. On October 3, 1991, during the construction of a storm sewer line, oil contamination was discovered because there was an oil sheen in the ditch dredged for the storm sewer line. The area were the ditch was located is referred to as the Oil Contamination Area (AOC 1). The oil and water mixture in the ditch was inadvertently pumped out of the ditch into a storm sewer line leading to the Boiling Water Reactor (BWR) Unit 1 intake canal. On December 11, 1992, No. 2 diesel fuel spilled to snow covered soil and gravel within the bermed area of a diesel fuel storage tank located on the north side of the facility. This area is referred to as the Diesel Fuel

RELEASED
DATE 11/22/01
RIN #
INITIALS

ENFORCEMENT CONFIDENTIAL

Spill Area No. 1. (AOC 2). On February 22, 1993, 20 gallons of mineral oil overflowed to soil and gravel from a tanker near the water intake structure on the north side of the facility. On November 26, 1993, a diesel oil fuel storage tank located on the southwest side of the facility leaked about 760 gallons of diesel fuel to soil and gravel. The latter area is referred to as the Diesel Fuel Spill Area No. 2 (AOC 3).

The facility has one National Pollutant Discharge Elimination System (NPDES) permit No. IL-0002224 which has nine outfalls. The facility has general air operating permit No. 73020783. The facility has a history of NPDES and air permit violations.

The potential for release to groundwater, surface water, air, and on-site soils for SWMUs 1 through 8 is low. The Mixed Waste CSA (SWMU 1), the Hazardous and Nonhazardous Waste CSA (SWMU 2), the SAAs (SWMU 3), the Non-Radioactive WWTP (SWMU 5), the Former Mixed Waste Storage Area (SWMU 7), and the Former Hazardous and Nonhazardous Waste CSA (SWMU 8) are all located indoors and have adequate secondary containment. The Outdoor Sludge Drying Beds (SWMU 6) is located outdoors and has adequate secondary containment. The Oil and Water Separators (SWMU 4) consist of subsurface concrete tanks. PRC recommends no further action for SWMUs 1 through 8.

The potential for release to groundwater is moderate because a release to on-site soils has been documented for AOCs 1 through 3. The extent of contamination has not been determined for the Oil Contamination Area (AOC 1), the Diesel Fuel Oil Spill Area No. 1 (AOC 2), and the Diesel Fuel Oil Spill Area No. 2 (AOC 3). The potential for release to surface water and air is low for AOCs 1 through 3. PRC recommends the facility conduct soil sampling activities to identify the extent of contamination in these areas.

RELEASED
DATE 1/22/01
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Commonwealth Edison - Dresden Nuclear Power Station (Dresden Station) facility (EPA Identification No. ILD 000 665 489) in Morris,

Grundy County, Illinois. The PA was completed on January 5, 1994. PRC gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA), the Illinois State Geological Survey (ISGS), the U.S. Department of Agriculture (USDA), the U.S. Department of Commerce (USDOC), the U.S. Department of the Interior (DOI), the U.S. Geological Survey (USGS), and from EPA Region 5 RCRA files. The VSI was conducted on January 6, 1994. It included interviews with facility representatives and a walk-through inspection of the facility. PRC conducted a second VSI at the facility on February 24, 1994. PRC identified eight SWMUs and three AOCs at the facility.

The VSI is summarized and 24 of the 27 inspection photographs taken are included in Appendix A. The photographs have been renumbered; thus, their numbers differ from the photograph numbers in the VSI field notes, which are included in Appendix B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The Dresden Station facility is located on Lorenzo Road, about 4 miles west of Interstate 55, in Morris, Grundy County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°24'00"N and longitude 88°15'00"W) (Commonwealth Edison 1994). The facility property occupies about 2,500 acres in a mixed rural, agricultural and industrial area. The facility property is composed of the nuclear power generating station (the facility), a cooling lake located to the south of the facility, intake and discharge canals between the facility and the cooling lake, and a tract of land leased from the State of Illinois containing about 17 acres of river frontage on the northwest corner of the facility property.

The facility is bordered on the north by the Illinois River; on the west by the Elgin, Joliet, and Eastern Railway right of way; on the south by a county road; and on the east by the Kankakee River and the confluence of the Kankakee and Des Plaines Rivers.

2.2 FACILITY OPERATIONS

The Dresden Station facility is a nuclear power station that generates electricity. Heat generated through nuclear fission is used to boil water which flows through the nuclear reactor core. The steam resulting from this process is channeled to turbines where the heat energy of the steam is converted to mechanical energy which is used to drive a generator. The generator then converts the mechanical energy into electrical power. The steam is then channeled to the condenser where it is cooled. An off-gas system collects steam that is not channeled to the condenser. The off-gas system cools and rechannels this steam to the condenser. The condenser uses river water collected from the water intake structures located on the north side of the facility for cooling purposes. The water used for

FACILITY LOCATION

COOLING LAKE

FACILITY LOCATION

SOURCE: MODIFIED FROM USGS;
WILMINGTON, ILLINOIS, QUADRANGLE, 1973,
COAL CITY, ILLINOIS, QUADRANGLE, 1973,
MINOOKA, ILLINOIS, QUADRANGLE, 1980,
AND CHANNAHON, ILLINOIS, QUADRANGLE, 1973

ILLINOIS
QUADRANGLE LOCATION

SCALE 1: 48000

2 1 0 2 MILES

2000 0 2000 4000 6000 8000 10,000 12,000 14,000 FEET

SCALE 1" = 4,000'

COMMONWEALTH EDISON COMPANY
DRESDEN NUCLEAR POWER STATION
MORRIS, ILLINOIS

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

cooling purposes circulates for reuse through the discharge canal, the cooling lake, and the intake canals.

The facility has three boiling water reactor (BWR) units (Units 1, 2, and 3). BWR Unit 1 was in commercial operation from 1960 to the 1978. BWR Units 2 and 3 began operating in 1970 and 1971, respectively, and are currently active. The facility obtains groundwater from on-site wells and uses it for general facility operations, including use in the operation of BWR Units 2 and 3 (Commonwealth Edison 1994).

Every 12 to 18 months, BWR Units 2 and 3 are refueled. Spent fuel, which contains too many fission products to be efficient, is removed and replaced with fresh fuel assemblies. During refueling periods, or "outages," approximately one-third of the radioactive fuel assemblies are removed.

The facility has three wastewater treatment plants (WWTP) in operation including a radioactive WWTP, a sewage WWTP, and a Non-Radioactive WWTP (SWMU 5). The sewage WWTP actually consists of two WWTPs, one that incorporates aerobic digesters, and one that incorporates trickling filters.

The facility has the following seven underground storage tanks (UST): three 15,000-gallon steel USTs for storing diesel fuel; one 500-gallon UST for storing diesel fuel; one 36,000-gallon, empty UST that was used for storing sodium hypochlorite; one 15,000-gallon, empty UST that has not been used for product storage; and one 560-gallon UST for gasoline storage. The 560-gallon UST used for gasoline storage is under the Commonwealth Edison Company's UST maintenance program, and the other USTs are NRC-regulated. Apparently, no leaks have been detected to date (PRC 1994b; Commonwealth Edison 1994).

The facility consists of about 30 buildings that occupies about 5,000,000 square feet (Commonwealth Edison 1994). During normal operations, the facility employs about 916 people on three shifts, 24-hours a day. However, during outage periods, as many as 2,000 people may be working on site. Most of the additional people employed during outages are contractors.

2.3 WASTE GENERATION AND MANAGEMENT

This section describes waste generation and management at the Dresden Station facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

However, this section does not discuss the generation of radioactive wastes regulated solely by the Nuclear Regulatory Commission (NRC). Additionally, the units that manage these NRC-regulated radioactive wastes, such as the radioactive waste treatment system and radioactive waste storage areas, are not discussed.

Since November 1, 1990, the facility has tested all hazardous and nonhazardous wastes generated from general maintenance and degreasing operations, excluding waste managed in the Non-Radioactive WWTP (SWMU 5) and the Outdoor Sludge Drying Beds (SWMU 6), for radioactivity. Hazardous waste tested to be radioactive waste is referred to as "mixed waste." Mixed waste is a RCRA-regulated hazardous waste. Hazardous waste that has not undergone radioactivity testing is referred to as "potential mixed waste." Nonhazardous waste determined to be radioactive is considered a NRC-regulated radioactive waste.

Between November 1, 1990, and February 7, 1991, hazardous and nonhazardous waste was tested for radioactivity in the SWMUs in which they were managed. The waste was considered potential mixed waste before the radioactivity testing was conducted. Hazardous waste determined to be mixed waste was transferred to the Former Mixed Waste Storage Area (SWMU 7), and hazardous waste determined not to be mixed waste was transferred to the Former Hazardous and Nonhazardous Waste Container Storage Area (CSA) (SWMU 8).

Between February 7, 1991, and May 30, 1993, hazardous and nonhazardous waste was still tested for radioactivity in the SWMUs in which they were managed. The waste was considered potential mixed waste before the radioactivity testing was conducted. Hazardous waste determined to be mixed waste was transferred to the Former Mixed Waste Storage Area (SWMU 7), however, hazardous waste determined not to be mixed waste was transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2).

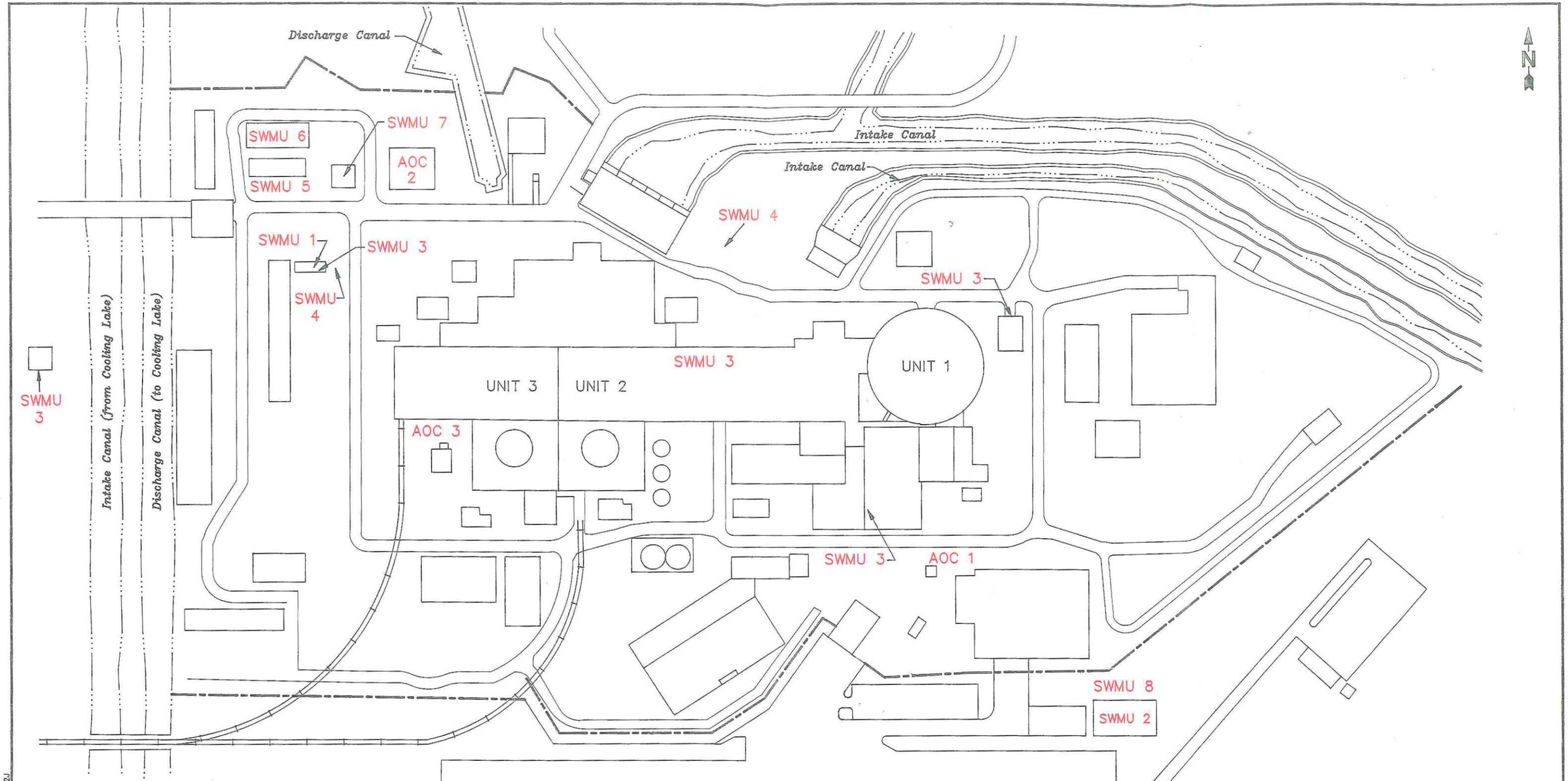
TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Mixed Waste CSA	Yes	Active; greater than 90-day storage of hazardous waste determined to be mixed waste, and less than 90-day storage of hazardous waste considered to be potential mixed waste
2	Hazardous and Nonhazardous Waste CSA	No	Active; 90-day storage of hazardous and nonhazardous waste
3	Satellite Accumulation Areas (SAAs)	No	Active; accumulation of hazardous and nonhazardous waste
4	Oil and Water Separators	No	Active; accumulation of nonhazardous waste
5	Non-Radioactive Wastewater Treatment Plant (WWTP)	No	Active for wastewater treatment
6	Outdoor Sludge Drying Beds	No	Inactive since 1988
7	Former Mixed Waste Storage Area	Yes	Inactive since May 1993
8	Former Hazardous and Nonhazardous Waste CSA	No	Inactive since February 7, 1991; stored hazardous and nonhazardous waste for less than 90 days

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



SOLID WASTE MANAGEMENT UNITS

SWMU 1	MIXED WASTE CONTAINER STORAGE AREA (CSA)
SWMU 2	HAZARDOUS AND NONHAZARDOUS WASTE CSA
SWMU 3	SATELLITE ACCUMULATION AREAS (SAAs)
SWMU 4	OIL AND WATER SEPARATORS
SWMU 5	NON-RADIOACTIVE WASTEWATER TREATMENT PLANT
SWMU 6	OUTDOOR SLUDGE DRYING BEDS
SWMU 7	FORMER MIXED WASTE STORAGE AREA
SWMU 8	FORMER HAZARDOUS AND NONHAZARDOUS WASTE CSA

AREAS OF CONCERN

AOC 1	OIL CONTAMINATION AREA
AOC 2	DIESEL FUEL SPILL AREA NO. 1
AOC 3	DIESEL FUEL SPILL AREA NO. 2

LEGEND

- SURFACE WATER BOUNDARY
- PROPERTY LINE
- RAILROAD TRACKS

SOURCE: MODIFIED FROM CECo 1994

NOT TO SCALE

COMMONWEALTH EDISON COMPANY
DRESDEN NUCLEAR POWER STATION
MORRIS, ILLINOIS

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

DRESDEN1.DWG - 02/28/94 - RAO - 309-R05032L2J

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Mixed waste/various waste codes[b]	General maintenance and degreasing operations	1 and 7
Potential mixed waste/various waste codes[c]	General maintenance and degreasing operations	1 and 3
Waste solvents/D001, D006, D007, D008, D010, D018, D029, D035, D036, D039, F002 and F005	General maintenance and degreasing operations	1, 2, 3, 7, and 8
Waste oils/F002, F005, D001, D006, D008, D018, D029, D036 and D039	General maintenance and degreasing operations	1, 2, 3, 7, and 8
Chlorinated waste solvent and oil mixture/D032, D033, D042, F001 and F003	General maintenance and degreasing operations	1, 2, 3, 7, and 8
Waste paint/D001, D030 and D034	General maintenance operations	1, 2, 3, 7, and 8
Lab pack waste/D001, D005, D009 and F002	Off-specification or outdated chemicals	1, 2, 3, 7, and 8
Waste ethyl glycol/D027, D032, D034 and D036	Equipment maintenance operations	1, 2, 3, 7, and 8
Nonroutinely generated waste/D001, D002, D007, D018 and F001	General maintenance and degreasing operations	1, 2, 3, 7, and 8
Wastewaters/Not characterized	Various facility processes and storm water runoff	5
Oil and grease/NA	Non-radioactive floor drainage and storm water runoff	1, 2, 4, 7, and 8
Non-radioactive WWTP sludge/NA	Non-radioactive WWTP operations	5 and 6

TABLE 2

SOLID WASTES (CONTINUED)

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Miscellaneous nonhazardous wastes/NA	General facility operations	1, 2, 3, 7, and 8

Notes:

[a] Not applicable (NA) designates nonhazardous waste

[b] Mixed waste is hazardous waste that has been determined to be radioactive. Mixed waste includes the following hazardous wastes listed on Table 2: waste solvents, waste oils, chlorinated waste solvent and oil mixture, waste paint, lab pack waste, waste ethyl glycol, and nonroutinely generated waste

[c] Potential mixed waste is hazardous waste that has not been determined to be radioactive. Potential mixed waste includes the following hazardous wastes: waste solvents; waste oils; chlorinated waste solvent and oil mixture; waste paint; lab pack waste; waste ethyl glycol; and nonroutinely generated waste

Since May 1993, hazardous and nonhazardous waste has been tested for radioactivity in the Mixed Waste CSA (SWMU 1). The waste is considered potential mixed waste before the radioactivity testing is conducted. Hazardous waste determined to be mixed waste remains at SWMU 1, and hazardous waste determined not to be mixed waste is transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). SWMU 1 manages mixed waste for longer than 90 days because no permitted waste disposal facilities accept mixed waste (Commonwealth Edison 1990b).

Facility operations generate the following hazardous wastes: waste solvents (D001, D006, D007, D008, D010, D018, D029, D035, D036, D039, F002 and F005); waste oils (F002, F005, D001, D006, D008, D018, D029, D036 and D039); chlorinated waste solvent and oil mixture (D032, D033, D042, F001 and F003); waste paint (D001, D030 and D034); lab pack waste (D001, D005, D009 and F002); waste ethyl glycol (D027, D032, D034 and D036); nonroutinely generated wastes (D001, D002, D007, D018 and F001); and wastewaters (not characterized). The facility operations also generate nonhazardous oil and grease, nonhazardous non-radioactive WWTP sludge, and miscellaneous nonhazardous wastes (Commonwealth Edison 1993b).

Waste solvents (with the previously mentioned waste codes) are generated from general maintenance and degreasing operations, such as parts cleaning, surface preparation for painting activities, equipment maintenance and vehicle maintenance. The facility manages waste solvents in the SAAs (SWMU 3) before transferring them to the Mixed Waste CSA (SWMU 1) for radioactivity testing. Waste solvents determined not to be mixed waste are transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). Before February 7, 1991, waste solvents were transferred from SWMU 3 to either the Former Mixed Waste Storage Area (SWMU 7) or the Former Hazardous and Nonhazardous Waste CSA (SWMU 8). The facility generates between 100 and 500 gallons of waste solvents a year. SET Environmental, Inc. (SET), located in Wheeling, Illinois, transports waste solvents from the facility to Treatment One, located in Houston, Texas, and Petrochem Processing, located in Detroit, Michigan, for fuels blending (Commonwealth Edison 1994).

Waste oils (with the previously mentioned waste codes) are generated from general maintenance and degreasing operations, such as parts cleaning, equipment maintenance, and vehicle maintenance. The facility manages wastes oils in the SAAs (SWMU 3) before transferring them to the Mixed Waste CSA (SWMU 1) for radioactivity testing. Waste oils determined not to be mixed waste are

transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). Before February 7, 1991, waste oils were transferred from SWMU 3 to either the Former Mixed Waste Storage Area (SWMU 7) or the Former Hazardous and Nonhazardous Waste CSA (SWMU 8). The facility generates between 100 and 500 gallons of waste oils a year. SET transports waste oils from Dresden Station to the following off-site destinations for fuels blending: Treatment One, located in Houston, Texas; Petrochem Processing, located in Detroit, Michigan; and Envirotech Management Services, Inc. (Envirotech), located in Detroit, Michigan (Commonwealth Edison 1994; PRC 1994a).

Chlorinated waste solvent and oil mixture (D032, D033, D042, F001, and F003) is generated from general maintenance and degreasing operations associated with wastewater treatment operations at the facility. The facility manages this waste in the SAAs (SWMU 3) before transferring it to the Mixed Waste CSA (SWMU 1) for radioactivity testing. Chlorinated waste solvent and oil mixture determined not to be mixed waste is transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). Before February 7, 1991, chlorinated waste solvent and oil mixture was transferred from SWMU 3 to either the Former Mixed Waste Storage Area (SWMU 7) or the Former Hazardous and Nonhazardous Waste CSA (SWMU 8). The facility generates between 1,000 and 1,200 gallons of this waste a year. SET transports this waste from Dresden Station to Petrochem Processing for fuels blending (Commonwealth Edison 1994; PRC 1994a).

Waste paint (D001, D030 and D034) is generated from general maintenance operations involving painting. The facility manages waste paint in the SAAs (SWMU 3) before transferring it to the Mixed Waste CSA (SWMU 1) for radioactivity testing. Waste paint determined not to be mixed waste is transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). Before February 7, 1991, waste paint was transferred from SWMU 3 to either the Former Mixed Waste Storage Area (SWMU 7) or either the Former Mixed Waste Storage Area (SWMU 7) or the Former Hazardous and Nonhazardous Waste CSA (SWMU 8). The facility generates between 100 and 300 gallons a year of waste paint. Waste paint is transported from Dresden Station by SET to Treatment One and Petrochem Processing for treatment (Commonwealth Edison 1994; PRC 1994a).

Lab pack waste (D001, D005, D009 and F002) is generated from off-specification or outdated chemicals. The facility manages lab pack waste in the SAAs (SWMU 3). Lab pack waste undergoes radioactivity testing in the Mixed Waste CSA (SWMU 1). Lab pack waste determined not to be

mixed waste is transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). Before February 7, 1991, lab pack waste was transferred from SWMU 3 to either the Former Mixed Waste Storage Area (SWMU 7) or the Former Hazardous and Nonhazardous Waste CSA (SWMU 8). The facility generates between 200 and 300 gallons of this waste a year. SET transports this waste from Dresden Station to Treatment One, located in Houston, Texas for treatment (Commonwealth Edison 1994; PRC 1994a).

Waste ethyl glycol (D027, D032, D034, and D036) is generated from equipment maintenance operations, specifically, the maintenance of generators. The facility manages waste ethyl glycol in the SAAs (SWMU 3) before transferring it to the Mixed Waste CSA (SWMU 1) for radioactivity testing. Waste ethyl glycol determined not to be mixed waste is transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). Before February 7, 1991, waste ethyl glycol was transferred from SWMU 3 to either the Former Mixed Waste Storage Area (SWMU 7) or the Former Hazardous and Nonhazardous Waste CSA (SWMU 8). The facility generates about 1,000 gallons of this waste a year. SET transports this waste to Treatment One, located in Houston, Texas, and to Clean Harbors, located in Chicago, Illinois, for treatment (Commonwealth Edison 1994; PRC 1994a).

Nonroutinely generated wastes (D001, D002, D007, D018, and F001) are generated from general maintenance and degreasing operations, such as parts cleaning, equipment maintenance, and vehicle maintenance. This facility manages these wastes in the SAAs (SWMU 3) before transferring them to the Mixed Waste CSA (SWMU 1) for radioactivity testing. Nonroutinely generated wastes determined not to be mixed waste are transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). Before February 7, 1991, nonroutinely generated wastes were transferred from SWMU 3 to either the Former Mixed Waste Storage Area (SWMU 7) or the Former Hazardous and Nonhazardous Waste CSA (SWMU 8). SET transports these wastes to the following off-site facilities: Envirotech, located in Detroit, Michigan; Clean Harbors, located in Chicago, Illinois; and Treatment One, located in Houston, Texas, for treatment (Commonwealth Edison 1994).

Facility operations generate wastewaters that are treated in the Non-Radioactive WWTP (SWMU 5). SWMU 5 is designed to process 100,000 gallons per day, however, the average amount of wastewater processed is between 10,000 and 20,000 gallons per day. These wastewaters are not characterized

before treatment; however, the discharge from SWMU 5 is regulated under the facility's National Pollutant Discharge Elimination System (NPDES) permit (Commonwealth Edison 1994).

Oil and grease is generated from non-radioactive floor drainage and storm water runoff. This waste is collected in the Oil and Water Separators (SWMU 4). The facility manages oil and grease in SWMU 4 before transferring it to the Mixed Waste CSA (SWMU 1) for radioactivity testing. Oil and grease determined not to be mixed waste is transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). Before February 7, 1991, oil and grease was transferred from SWMU 4 to either the Former Mixed Waste Storage Area (SWMU 7) or the Former Hazardous and Nonhazardous Waste CSA (SWMU 8). The facility generates between 300 and 400 gallons a year of this waste. This waste is picked up directly from Dresden Station for reclamation by Heritage Oil, located in Lemont, Indiana, or Solar Environmental, located in Gary, Indiana (Commonwealth Edison 1994).

The Non-Radioactive WWTP (SWMU 5) generates non-radioactive WWTP sludge that is managed in the Outdoor Sludge Drying Beds (SWMU 6). The sludge is considered non-radioactive waste when it enters the drying beds. When the sludge dries, radioactive solids become more concentrated. The dried sludge is considered a NRC-regulated radioactive waste. Since SWMU 5 began operation on December 31, 1978, only minimal amounts of non-radioactive WWTP sludge has been generated. According to a facility representative, no significant amount of sludge has accumulated in SWMU 6, and no sludge has been transported off-site.

Miscellaneous nonhazardous wastes are generated from general facility operations, such as equipment and vehicle maintenance. These miscellaneous nonhazardous wastes primarily consist of used oils. The facility manages this waste in the SAAs (SWMU 3) before transferring it to the Mixed Waste CSA (SWMU 1) for radioactivity testing. Miscellaneous nonhazardous wastes determined not to be mixed waste are transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2). Before February 7, 1991, miscellaneous nonhazardous wastes were transferred from SWMU 3 to either the Former Mixed Waste Storage Area (SWMU 7) or the Former Hazardous and Nonhazardous Waste CSA (SWMU 8). The facility generates between 2,000 and 3,000 gallons of miscellaneous nonhazardous wastes a year. SET transports some of these wastes from Dresden Station to the following off-site facilities for reclamation activities: Treatment One, located in Houston, Texas; Petrochem Processing, located in Detroit, Michigan; and Envirotech, located in Detroit, Michigan,

for fuels blending. Miscellaneous nonhazardous wastes are picked up directly from Dresden Station for reclamation by Heritage Oil, located in Lemont, Indiana; and by Solar Environmental, located in Gary, Indiana. Safety-Kleen Corporation, located in Chicago, Illinois, transports these wastes from Dresden Station to Breslube, located in East Chicago, Indiana (Commonwealth Edison 1994; PRC 1994a).

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to groundwater, surface water, air, and on-site soils at the facility.

On February 27, 1985, an unknown quantity of waste oil spilled to an unidentified river in the vicinity of the facility (Commonwealth Edison 1994). Available information did not indicate whether the spill released to the Illinois or Kankakee River. No additional information is available regarding this spill.

On several occasions, a sewage treatment surge tank located on the north side of the facility has overflowed and its contents spilled to the soil. On November 17, 1980, the surge tank overflowed and 50 gallons of sewage spilled to the soil (Commonwealth Edison 1980b). On January 7, 1981, the surge tank overflowed and 3,000 gallons of sewage spilled on the soil (Commonwealth Edison 1981a). On March 10, 1981, the surge tank overflowed and spilled about 200 gallons of sewage to the soil (Commonwealth Edison 1981b). On March 14, 1981, the surge tank overflowed and spilled about 200 gallons of sewage to the soil (Commonwealth Edison 1981c). These spills were remediated by facility personnel. No spills from the overflowing surge tank reached the Kankakee River, which is located adjacent to the north of the Dresden Station.

On September 8, 1987, 100 gallons of liquid sulfuric acid spilled to a gravel area while it was being transferred from a delivery tank truck to a storage tank. The sulfuric acid was neutralized with soda ash and was contained in and around the gravel area near the storage tank (Commonwealth Edison 1987). No additional information is available regarding this sulfuric acid spill.

On January 18, 1989, a garbage truck leaked about 30 gallons of hydraulic oil to soil and gravel located on the southwest side of the facility. Stained soil and gravel was removed from the spill area and transported by SET to Land and Lakes Landfill No. 3, located in Chicago, Illinois (Commonwealth Edison 1994; PRC 1994a). No additional information is available regarding this hydraulic oil spill.

On August 18, 1989, about 1,000 gallons of sodium hypochlorite spilled from a sodium hypochlorite storage tank to the soil. Portions of the spill migrated to a storm sewer that discharges to the Illinois River. Portions of the spill also migrated to the cooling lake. Soils affected by this spill were removed and replaced (Commonwealth Edison 1994). No additional information is available regarding this sodium hypochlorite spill.

On August 6, 1990, a transformer located on the west side of the facility ruptured and spilled about 20 gallons of its contents to soil and gravel surrounding the transformer. The transformer oil was sampled and found to contain no polychlorinated biphenyls (PCB). Stained soils were removed from the spill area and transported by SET to the Treatment One facility in Houston, Texas (IEPA 1992a). No additional information is available regarding this spill.

On November 5, 1990, a sodium hypochlorite storage tank spilled 150 gallons of sodium hypochlorite to the soil. The soil affected by the spill was removed and replaced (Commonwealth Edison 1994). No additional information is available regarding this sodium hypochlorite spill.

On March 6, 1991, a transformer leaked less than one gallon of oil containing PCBs to concrete surrounding the transformer (Commonwealth Edison 1994). No additional information is available regarding this spill.

On March 13, 1991, a 5,800-gallon sodium hypochlorite storage tank located near the water intake structure on the north side of the facility spilled its contents to the snow, soil, and pavement in the area of the storage tank. The release occurred because the bottom drain valve was sheared off the storage tank by a maintenance truck. An estimated 3,450 pounds of sodium hypochlorite entered a storm sewer connected to the discharge canal. In a letter from Commonwealth Edison to IEPA, a facility representative stated that the release may have migrated to the cooling lake that leads to the

Illinois River, and may have resulted in a violation of the facility's NPDES permit (Commonwealth Edison 1991a; Commonwealth Edison 1991b). No additional information is available regarding this release.

On October 3, 1991, during the construction of a storm sewer line, the Oil Contamination Area (AOC 1) located on the southeast side of the facility was discovered. After a rainfall, an oil sheen appeared on standing water in the ditch constructed for the storm sewer line. The oil and water mixture was inadvertently pumped out of the ditch into a storm sewer line leading to the BWR Unit 1 intake canal. Oil booms were placed at several locations in the BWR Unit 1 intake canal to prevent an oil release to the Illinois and Kankakee Rivers. No release was documented to either river. The areas affected by the release include the ditch and the BWR Unit 1 intake canal. The remaining oil and water mixture was pumped from the ditch into a portable tank and was transported to an Oil and Water Separator (SWMU 4) unit. The effluent from this oil and water separator goes to the facility's Non-Radioactive WWTP (SWMU 5), which discharges to the Illinois River under the facility's National Pollution Discharge Elimination System (NPDES) permit (Commonwealth Edison 1991d). Stained soils were removed and transported by SET to Land and Lakes Landfill No. 3, located in Chicago, Illinois (PRC 1994a). The possible source of this oil contamination is a former fuel island, however, the facility has not conducted an investigation to determine the source and extent of contamination in this area. No additional information is available regarding this contamination.

On December 11, 1992, No. 2 diesel fuel spilled to snow covered soil and gravel within the bermed area of a diesel fuel storage tank located on the north side of the facility. This area is referred to as the Diesel Fuel Spill Area No. 1 (AOC 2). The facility manifested about 3,600 gallons of diesel fuel mixed with water to Heritage Oil, an oil recycling facility in Lemont, Illinois. Moret Construction Inc. removed 66 cubic yards of soil contaminated with oil and transported it for landfilling to Land and Lakes No. 3 landfill, located in Chicago, Illinois (Commonwealth Edison 1993a). The facility has not conducted an investigation to determine the source and extent of contamination in this area.

On February 22, 1993, 20 gallons of mineral oil overflowed to soil and gravel from a tanker near the water intake structure on the north side of the facility. Facility personnel contained the spill with absorbent material (Commonwealth Edison 1994). No additional information is available regarding this mineral oil spill.

On November 26, 1993, a diesel oil fuel storage tank located on the southwest side of the facility leaked about 760 gallons of diesel fuel to soil and gravel (Commonwealth Edison 1994). This area is referred to as the Diesel Fuel Spill Area No. 2 (AOC 3). Facility personnel used absorbent material to remediate the spill. According to a facility representative, soil and gravel affected by the spill was found to contain traces of radioactivity. The soil and gravel was containerized and considered NRC-regulated radioactive waste. No additional information is available regarding this diesel oil spill.

2.5 REGULATORY HISTORY

On August 14, 1980, the facility submitted a Notification of Hazardous Waste Activity form to EPA (Commonwealth Edison 1980a). The facility filed the notification as a generator that treats, stores, and disposes of hazardous waste with EPA identification No. ILD 000 665 489. The notification listed waste codes F001, F002, and D002. On September 28, 1982, EPA notified the facility that it received a Notification of Hazardous Waste Activity form identifying Dresden Station as a treatment, storage, and disposal (TSD) facility. EPA indicated that the facility had not submitted a Part A permit application as required by TSD facilities (EPA 1982). On October 4, 1982, the facility notified EPA that the Notification of Hazardous Waste Activity form erroneously identified Dresden Station as a TSD facility, and that the facility would therefore not be submitting a Part A permit application (Commonwealth Edison 1982).

On May 6, 1985, the facility received a permit to construct and operate a mobile air emission volume reduction system. The system consisted of an incinerator with primary and secondary combustors, a venturi scrubber, a charcoal adsorption unit (optional), dry active and liquid waste feed systems for radioactive wastes, a process air compressor, an emergency generator, and a bottom ash agglomerator to control sulfur dioxide, nitrogen oxides, carbon monoxide, and organic material emissions (IEPA 1985b). On August 12, 1988, the facility requested withdrawing its request for the construction and operating permit, and on December 23, 1988, IEPA confirmed withdrawal of the permit. The construction of the incinerator was never completed (IEPA 1988).

A Part A permit application dated October 26, 1990, for Dresden Station indicates a container storage unit (S01) unit with a capacity of 3,300 gallons. This S01 unit is referred to as the Former Mixed Waste Storage Area (SWMU 7). The application indicates that mixed wastes have been stored at the

facility since July 6, 1987. Mixed waste was not regulated by EPA until November 1, 1990. The application also indicates an estimated annual generation rate of 4,390 pounds of F002 mixed waste, 1,925 pounds of F001 mixed waste, 7,150 pounds of D008 mixed waste, and 1,776 pounds of D001 mixed waste (Commonwealth Edison 1990a).

On December 19, 1990, IEPA acknowledged receipt of the Part A permit application. IEPA determined that Dresden Station was subject to RCRA interim status storage standards because it stored mixed waste for longer than 90 days. IEPA determined the facility had the following requirements: a maximum of 3,300 gallons of mixed waste may be stored for longer than 90 days; and only mixed wastes, which are both hazardous and radioactive, with EPA hazardous waste code F001, F002, D001 or D008 may be stored in the container storage area (IEPA 1990).

On March 31, 1992, and May 19, 1993, IEPA conducted RCRA compliance inspections at the facility, and no compliance problems were identified. An IEPA memorandum dated May 26, 1993, indicated that the facility had no history of compliance problems (IEPA 1993b).

On July 1, 1992, the facility submitted a revised Part A permit application to IEPA to increase the process design capacity of the mixed waste storage area from 3,300 to 7,000 gallons; to add an additional hazardous waste CSA for mixed waste; and add additional EPA waste codes to the existing Part A permit application. The waste codes added include the following: D004, D005, D006, D007, D010, D018, D029, D035, D036, D039, and F005. On June 30, 1992, and April 23, 1993, the facility provided additional information to IEPA regarding the revised Part A permit application (Commonwealth Edison 1992b; Commonwealth Edison 1993b). On May 18, 1993, IEPA approved the facility's request, allowing the storage of a combined maximum of 7,000 gallons of mixed waste (IEPA 1993a). The mixed waste storage includes the Former Mixed Waste Storage Area (SWMU 7) and the Mixed Waste CSA (SWMU 1).

The facility has the following seven underground storage tanks (UST): three 15,000-gallon steel USTs for storing diesel fuel; one 500-gallon UST for storing diesel fuel; one 36,000-gallon, empty UST that was used for storing sodium hypochlorite; one 15,000-gallon, empty UST that has not been used for product storage; and one 560-gallon UST for gasoline storage. The 560-gallon UST for gasoline storage is under the Commonwealth Edison Company's UST maintenance program, and the

other USTs are NRC-regulated. Apparently, no leaks have been detected to date (PRC 1994b; Commonwealth Edison 1994).

The facility has one NPDES permit No. IL-0002224 permitting nine outfalls. On August 30, 1988, the facility submitted an NPDES permit application to EPA (Commonwealth Edison 1988). The application included an NPDES permit application for Outfalls 001, 001(a), 002, 002(a), 002(b), 002(c), 002(d), 003, and 004. On August 26, 1991, IEPA issued the facility an NPDES permit with an effective date of September 25, 1991, and an expiration date of June 1, 1995 (IEPA 1991).

The following is a summary of NPDES discharges to surface water in the vicinity of the facility (IEPA 1991):

DISCHARGE NUMBER	DISCHARGE NAME
001	BWR Unit 1 Service Water
001(a)	BWR Unit 1 Intake Screen Backwash
002	Cooling Pond Blowdown
002(a)	BWR Unit 2 and 3 Intake Screen Backwash
002(b)	Wastewater Treatment System Effluent
002(c)	RadWaste Treatment System Effluent
002(d)	Demineralizer Regenerate Waste
003	Sewage Treatment Plant Effluent
004	Cooling Pond Discharge

On October 4, 1984, IEPA conducted an NPDES compliance sampling inspection and discovered that the facility had chronically exceeded permit limitations at Outfall 003 from the sewage treatment plant (IEPA 1985a). The facility violated the permit for the discharge at Outfall 002(c) in November 1986,

because the oil and grease parameter were exceeded (Commonwealth Edison 1986b). On January 16 and 17, 1992, the facility violated Outfall 002 total residual chlorine concentrations in the cooling pond blowdown. The residual chlorine concentrations were recorded as 0.98 parts per million (ppm) and 0.35 ppm (Commonwealth Edison 1992a).

The facility has general air operating permit No. 73020783. Air emissions sources at the facility include two fuel oil fired auxiliary boilers, three diesel generators, 13 storage tanks, and a test boiler. The two fuel oil fired auxiliary boilers are in the process of being dismantled (IEPA 1986; IEPA 1993b). On June 17, 1986, the facility received an IEPA violation for operating an emergency auxiliary boiler without a permit (Commonwealth Edison 1986a). On April 20, 1992, IEPA acknowledged that the facility withdrew the operating permit for the standby emergency auxiliary boiler (IEPA 1992b).

Available information indicates that there has been no Comprehensive Environmental Response Compensation Liability Act (CERCLA) activities at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

2.6.1 Climate

The climate in Grundy County is continental. The average daily temperature is 49 °F. The lowest average daily temperature is 17 °F in January. The highest average daily temperature is 84 °F in July (USDA 1980).

The total annual precipitation for the county is 30 inches (USDA 1980). The mean annual lake evaporation for the area is about 30 inches (USDOC 1968). The 1-year, 24-hour maximum rainfall is about 2.5 inches (USDOC 1963). Average seasonal snowfall is 22 inches. The average relative humidity in mid-afternoon is about 60 percent (USDA 1980).

The prevailing wind is from the west. Average wind speed is highest in spring, at 11 miles per hour (USDA 1980).

2.6.2 Flood Plain and Surface Water

The facility is not located within a 100-year floodplain. The nearest surface water bodies, the Illinois, Kankakee, and Des Plaines Rivers, are all located adjacent to the facility. The Kankakee River, located to the east of the facility, flows north into the Des Plaines River on the northeast of the facility. The Des Plaines River flows west into the Illinois River. These rivers are used for navigation, sewage disposal for metropolitan Chicago, and for industrial purposes. The ultimate outlet for the Illinois River is the Mississippi River, which is located about 200 miles downstream of the facility (Commonwealth Edison 1994).

Surface water drainage at the facility is toward the Illinois River. Storm water runoff at the facility is treated in the Non-Radioactive WWTP (SWMU 5) and discharged to a storm water drainage ditch system, which discharges directly to the Illinois River (Commonwealth Edison 1994).

2.6.3 Geology and Soils

The upper layer of bedrock near the facility is of Pennsylvania age. The Pennsylvania system consists mainly of fine-grained sandstone, clay, shale, and one or two seams of coal. Below the Pennsylvania age system, Maquoketa Shale, the Galena-Platteville Formation, and the St. Peter Sandstone units all of the Ordovician Period may be encountered. Maquoketa Shale is composed of calcareous shale and limestone. The Galena-Platteville Formation consists of dolomite and dolomitic limestone which may be up to 400 feet thick. St. Peter Sandstone contains compacted to slightly compacted quartz grains and is about 200 feet thick (ISGS 1922).

The facility is situated above an area referred to as the Kankakee Plain, which is a level to gently undulating plain that occupies the position of a basin between higher moraine country to the east and west. Low ridges, terraces, bars, and dunes locally rise above the general level. The elevation in the immediate vicinity of the facility varies from 509 to 526 feet above sea level. The only deviation is

the Kankakee Bluffs with elevations of 591 to 624 feet and are located just northeast of the facility on the north bank of the Illinois River (Commonwealth Edison 1994).

The facility is mostly underlain by an Urban Land-Orthents complex. The western portion of the facility area is underlain by the Bryce-Shadeland-High Gap soil association native to this area. The Urban Land-Orthents complex consists of nearly level, altered, medium-textured soils. The Bryce-Shadeland-High Gap association is characterized by nearly level, somewhat poorly drained soil. Typically, the surface soil layer is very dark, grayish-brown loam about 1 to 2-1/2 feet thick. The subsurface layer consists of sandy silts with clay and clayey silts with sand. The glacial till extends to the top of the bedrock, which ranges from 12 to 31 feet below the surface (Commonwealth Edison 1994).

2.6.4 Groundwater

The Cambrian-Ordovician aquifer is used almost exclusively as the groundwater supply for the municipal and industrial use in the area. This aquifer consists, in descending order, of the Galena-Platteville dolomite, Glenwood-St. Peter sandstone, and Prairie du Chien Series of Ordovician age; and the Tempeauleau dolomite, Franconia Formation and Ironton-Galesville sandstone of the Cambrian age. This aquifer is separated from the Mt. Simon aquifer by shale beds of the Eau Claire formation (Commonwealth Edison 1994).

Water-yielding deposits consisting of medium- to coarse-grained sand and some fine gravel may be present at less than 65 feet below ground surface (bgs) along the Illinois River (ISGS 1955). The Galena-Platteville Formation is also used as an aquifer in the area (ISGS 1955). However, the St. Peter sandstone unit is the chief source of water for municipal, industrial, and domestic purposes in north-central Illinois (ISGS 1955; USGS 1986).

The direction of groundwater in the vicinity of the facility is not known. The facility has two wells that tap the Cambrian-Orodivician aquifer and are each 1,500-feet deep (Commonwealth Edison 1994).

2.7 RECEPTORS

The facility occupies about 2,500 acres in a mixed agricultural and industrial area in Morris, Grundy County, Illinois. The population within a 1-mile radius of the facility is about 150 people (Commonwealth Edison 1994).

The facility is bordered on the north by the Illinois River; on the west by the Elgin, Joliet, and Eastern Railway right of way; on the south by a county road; and on the east by the Kankakee River. The nearest residential area is located about 0.6 mile southeast of the facility. Access to the facility is restricted by high security fencing and 24-hour security guards.

The nearest surface water bodies, the Illinois, Kankakee, and Des Plaines Rivers, are located adjacent to the facility and are presently used for navigation, sewage disposal for metropolitan Chicago, and for industrial purposes (Commonwealth Edison 1994). Groundwater is the source of all potable water in the vicinity of the facility. The facility has two wells that are 1,500 feet deep and tap the Cambrian-Orodivician aquifer for general facility use, including drinking water. According to a facility representative, the residences located to the south of the facility may use residential wells for drinking water purposes. The nearest sensitive environment is a wetland area located within 1 mile southwest of the facility (DOI 1983).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the eight SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1 **Mixed Waste CSA**

Unit Description: This unit consists of a 50-foot by 64-foot area located within a building on the west side of the facility. This building has a bermed, epoxy-coated floor and has two garage doors. This area currently stores 198 55-gallon drums containing either mixed waste or potential mixed waste. This area is used to test radioactivity of hazardous and nonhazardous wastes generated at the facility. Hazardous waste that has not been tested for radioactivity is considered to be potential mixed waste. The drums having contents tested to be radioactive, considered mixed waste, will remain in the this unit. The drums having contents tested to be non-radioactive are transferred to the Hazardous and Nonhazardous Waste CSA (SWMU 2).

Date of Startup: This unit began operation in May 1993.

Date of Closure: This unit is currently active for greater than 90-day storage of mixed waste.

Wastes Managed: The 198 55-gallon drums managed in this unit are composed of 187 55-gallon drums containing mixed waste, and 11 55-gallon drums containing potential mixed waste generated from general facility maintenance and degreasing operations. The mixed wastes and potential mixed wastes include waste solvents, waste oils, chlorinated waste solvent and oil mixture, waste paint, lab pack waste, waste ethyl

	glycol, nonroutinely generated waste, oil and grease, and miscellaneous nonhazardous waste. Section 2.3 identifies the waste codes and generation rates transporters, and off-site disposal facilities associated with these wastes. Because a disposal facility will not accept mixed waste, this waste remains on site and is stored for greater than 90 days.
Release Controls:	The wastes are managed in closed containers in an epoxy-coated floor within a facility building.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed the area inside the facility building containing this unit. No evidence of release was noted (see Photographs No. 1, 2, 3, and 4).
SWMU 2	**Hazardous and Nonhazardous Waste CSA**
Unit Description:	This unit manages hazardous and nonhazardous waste in a 50-foot by 64-foot building located outside the high security fencing on the southeast side of the facility. The building has one garage door. This unit currently stores 60 55-gallon drums and contains cabinets for lab pack waste storage. The cabinets currently contain one 5-gallon container. The 55-gallon drums are grouped together in various areas of the storage building (see Photographs No. 12, 15, 16, and 17). The lab pack waste storage area is located on the east side of the building (see Photographs No. 13 and 14).
Date of Startup:	This unit began operation on February 7, 1991.

Date of Closure:	This unit is currently active for less than 90-day storage of hazardous and nonhazardous waste.
Wastes Managed:	This unit manages hazardous and nonhazardous wastes in closed containers including waste solvents, waste oils, chlorinated waste solvent and oil mixture, waste paint, lab pack waste, waste ethyl glycol, nonroutinely generated waste, oil and grease, and miscellaneous nonhazardous waste. Section 2.3 identifies the waste codes and generation rates, transporters, and off-site disposal facilities associated with these wastes.
Release Controls:	The hazardous and nonhazardous wastes are managed in closed containers on an epoxy-coated floor within a facility building.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed the area inside the facility building that contains this unit. PRC observed that the epoxy-coating on the floor of the building was of poor quality. No evidence of release was noted (see Photographs No. 12 through 17).
SWMU 3	**SAAs**
Unit Description:	This unit consists of five separate areas that accumulate potential mixed waste in 55-gallon drums. These areas are located indoors on concrete floors within facility buildings. Figure 2 identifies the locations of these five areas.
Date of Startup:	This unit began operating in the mid-1980s.

Date of Closure:	This unit is currently active for accumulation of hazardous and nonhazardous waste.
Wastes Managed:	The five areas of this unit are currently used to accumulate potential mixed waste in 55-gallons drums. The unit currently manages 14 55-gallon drums. The potential mixed waste refers to the following hazardous wastes: waste solvents, waste oils, chlorinated waste solvent and oil mixture, waste paint, lab pack waste, waste ethyl glycol, nonroutinely generated waste. The five areas also manage miscellaneous nonhazardous wastes. Section 2.3 identifies the waste codes and generation rates, transporters, and off-site disposal facilities associated with these wastes.
Release Controls:	These areas manage waste in closed containers on epoxy-coated concrete floors within facility buildings.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed each of the five approximately 3-foot by 3-foot areas. No evidence of release was noted. (see Photographs No. 6, 9, 10, and 11).
SWMU 4	**Oil and Water Separators**
Unit Description:	The unit consists of two oil and water separators, one for BWR Unit 1, and one for BWR Units 2 and 3. The separators manage non-radioactive floor drainage and the facility's storm water runoff. The separator for BWR Unit 1 is located below grade to the west of the BWR Unit 1 water intake structure located on the north side of the facility. This separator is a concrete tank covering a 400-square-foot area that can handle a maximum flow of 65,000 gallons a day. This

	separator incorporates a system of weirs and baffles to collect oil and grease. The separator for BWR Units 2 and 3 is located below grade on the south of the Non-Radioactive WWTP (SWMU 5). This separator is a 37-foot long by 8-foot wide concrete tank designed to handle a maximum of 45,000 gallons a day. This separator removes oil and grease with a floating skimmer. The effluent from the separators is transferred to ejector pits, which transfer the effluent to the Non-Radioactive WWTP (SWMU 5).
Date of Startup:	This unit began operating in 1960.
Date of Closure:	This unit is currently active.
Wastes Managed:	This unit manages oil and grease separated from non-radioactive floor drainage and the facility's storm water runoff. The separators generate between 200 and 300 gallons of oil and grease a year. Section 2.3 identifies transporters and off-site disposal facilities associated with these wastes.
Release Controls:	This unit consists of two concrete separators that are located below grade. The separators have no other form of release control.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed the surface above this unit. No evidence of release was noted (see Photograph No. 5).
SWMU 5	**Non-Radioactive WWTP**
Unit Description:	This unit is located indoors within a building on the west side of the facility. This primary components of this unit include the following:

	one 35,300-gallon, open-topped, steel equalization tank; two open-topped steel flocculator and clarifier tanks; and two 60-square-foot, duel media filters. The system has a design process rate of about 100,000 gallons of wastewater per day, however, the system averages between 10,000 and 20,000 gallons per day.
Date of Startup:	This unit began operation in December 31, 1978.
Date of Closure:	This unit is currently active.
Wastes Managed:	This unit manages wastewaters generated from non-radioactive floor drains and storm water runoff. These wastewaters are not characterized before treatment; however, the discharge from SWMU 5 is regulated under the facility's NPDES permit.
Release Controls:	The components of this unit are located within a facility building.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed portions of the unit within the building. No evidence of release was noted (see Photographs No. 7 and 8).
SWMU 6	**Outdoor Sludge Drying Beds**
Unit Description:	This unit consists of an area containing five 40-foot by 20-foot sludge drying beds located outside and to the north of the Non-Radioactive WWTP (SWMU 5). Since the unit began operating, the sludge drying beds have rarely been used.
Date of Startup:	This unit began operating on December 31, 1978.

Date of Closure:	This unit is currently active.
Wastes Managed:	This unit managed non-radioactive WWTP sludge from the Non-Radioactive WWTP (SWMU 5). The sludge is considered non-radioactive waste when it enters the drying beds. When the sludge dries, radioactive solids become more concentrated. The dried sludge is considered a NRC-regulated radioactive waste. According to a facility representative, only minimal amounts of non-radioactive WWTP sludge has been generated since SWMU 5 began operating on December 31, 1978. According to a facility representative, no significant amount of sludge has accumulated in SWMU 6, and no sludge has been transported off-site.
Release Controls:	This unit consists of five concrete sludge drying beds.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed this unit and noted no evidence of a release (the photograph of this unit is undeveloped).
SWMU 7	**Former Mixed Waste Storage Area**
Unit Description:	This unit consists of an area containing four 20-foot wide, by 9-foot high, by 8-foot deep trailers located adjacent to the building containing the Mixed Waste CSA (SWMU 1). The trailers were used to store mixed waste in 55-gallon drums for greater than 90 days before the construction of the Mixed Waste CSA (SWMU 1). Each of these trailers can hold about 32 55-gallon drums.
Date of Startup:	This unit began operations when the facility began controlling mixed waste on November 1, 1990 (PRC 1994a).

Date of Closure:	This unit became inactive when the facility began transferring the mixed waste to SWMU 1 in May 1993. The unit is currently not undergoing closure activities, and could be reactivated if necessary.
Wastes Managed:	This unit was used to store mixed waste before SWMU 1 was constructed in May 1993. The mixed wastes include waste solvents, waste oils, chlorinated waste solvent and oil mixture, waste paint, lab pack waste, waste ethyl glycol, nonroutinely generated waste, oil and grease, and miscellaneous nonhazardous waste. The unit managed 67 42- and 55-gallon drums, with a total of 2,865 gallons of mixed waste.
Release Controls:	This unit consists of fully enclosed trailers, each with containment sumps that have a capacity of 650 gallons.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed this unit and noted no evidence of a release (see Photographs No. 21 and 22).
SWMU 8	**Former Hazardous and Nonhazardous Waste CSA**
Unit Description:	This unit consists of a 20-foot by 30-foot blacktopped area outside and directly north of the building containing the Hazardous and Nonhazardous Waste CSA (SWMU 2). This area was used to store 55-gallon drums containing hazardous and nonhazardous waste for less than 90 days.
Date of Startup:	This unit began operations in 1985.
Date of Closure:	This unit became inactive on February 7, 1991.

Wastes Managed:	This unit was used to store between 50 and 100 55-gallon drums containing waste solvents, waste oils, chlorinated waste solvent and oil mixture, waste paint, lab pack waste, waste ethyl glycol, nonroutinely generated waste, nonhazardous oil and grease, and miscellaneous nonhazardous wastes.
Release Controls:	This unit consisted of an outdoor area in where wastes were stored in 55-gallon drums on an asphalt surface. There were no other release controls for this unit.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed the snow-covered asphalt area. No evidence of release was noted (see Photograph No. 18).

4.0 AREAS OF CONCERN

PRC identified three AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

AOC 1 Oil Contamination Area

This area consists of a blacktopped area on the southeast side of the facility. On October 3, 1991, during the construction of a storm sewer line, an oil sheen appeared on some water present in the ditch constructed for the storm sewer line. The oil and water mixture was inadvertently pumped out of the ditch into a storm sewer line leading to the BWR Unit 1 intake canal. According to a facility representative, the possible source of this oil contamination is a former fuel island, however, the facility has not conducted an investigation to determine the source and extent of contamination in this area (see Photograph No. 24).

AOC 2 Diesel Fuel Spill Area No. 1

This area consists of soil and gravel within the bermed area of a diesel fuel storage tank located on the north side of the facility. On December 11, 1992, No. 2 diesel fuel spilled to snow covered soil and gravel within the bermed area of a diesel fuel storage tank. The facility manifested about 3,600 gallons of diesel fuel mixed with water that resulted from melted snow, to Heritage Oil, an oil recycling facility in Lemont, Illinois. Moret Construction Inc. removed 66 cubic yards of soil contaminated with oil and transported it for landfilling to Land and Lakes No. 3 landfill located in Chicago, Illinois (Commonwealth Edison 1993a). The facility has not conducted an investigation to determine the source and extent of contamination in this area (see Photograph No. 20).

AOC 3 Diesel Fuel Spill Area No. 2

This area consists of soil and gravel located on the southwest side of the facility. On November 26, 1993, a diesel oil fuel storage tank leaked about 760 gallons of diesel fuel to soil and gravel (Commonwealth Edison 1994). Absorbent material was used to remediate the spill, and soil and gravel affected by the spill was found to contain traces of radioactivity. According to a facility representative, stained soil and gravel was containerized and handled as radioactive waste, which is regulated by the NRC. The facility has not conducted an investigation to determine the source and extent of contamination in this area (see Photograph No. 23).

ENFORCEMENT
CONFIDENTIAL

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified eight SWMUs and three AOCs at the facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, located at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU 1 **Mixed Waste CSA**

Conclusions: This unit consists of an area that manages mixed waste and potential mixed waste in closed containers in a building located on the west side of the facility. The area currently manages 198 55-gallon drums. This area is used to test radioactivity of hazardous and nonhazardous wastes generated at the facility. The wastes determined to be mixed wastes remain in the unit. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 2 **Hazardous and Nonhazardous Waste CSA**

Conclusions: This unit manages hazardous and nonhazardous wastes in 55-gallon drums in a building located outside of the high security fencing on the southeast side of the facility. The unit currently manages 60 55-gallon drums and contains cabinets for lab pack waste storage. The cabinets currently contain one 5-gallon container. No releases from this unit have been documented. The potential for release to all environmental media is low.

RELEASED
DATE 1/22/01
RIN #
INITIALS MV

ENFORCEMENT
CONFIDENTIAL

Recommendations: PRC recommends no further action at this time.

SWMU 3 **SAAs**

Conclusions: The unit consists of five areas that accumulate potential mixed waste in 55-gallon drums. The areas are located on concrete floors within facility buildings. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 4 **Oil and Water Separators**

Conclusions: The unit consists of two oil and water separators. The separators are located below grade, and are constructed of concrete. The separator units manage non-radioactive floor drainage and the facility's surface water runoff. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 5 **Non-Radioactive WWTP**

Conclusions: This unit is located within a building on the west side of the facility. The primary components of this unit include the following: one 35,300-gallon steel equalization tank; two steel flocculator and clarifier tanks; and two 60-square-foot, duel media filters. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

RELEASED
DATE 1/22/01
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

SWMU 6 **Outdoor Sludge Drying Beds**

Conclusions: This unit consists of an area containing five 40-foot by 20-foot sludge drying beds located outside and to the north of the Non-Radioactive WWTP (SWMU 5). According to a facility representative, no significant amount of sludge has accumulated in SWMU 6, and no sludge has been transported off-site. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 7 **Former Mixed Waste Storage Area**

Conclusions: This unit consists of four 20-foot by 8-foot trailers formerly used to store 55-gallon drums containing mixed waste. No waste is managed in this unit. The unit is currently not undergoing closure activities, and could be reactivated if necessary. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 8 **Former Hazardous and Nonhazardous Waste CSA**

Conclusions: The unit consists of a 20-foot by 30-foot blacktopped area on the north side of the building containing the Hazardous and Nonhazardous Waste CSA (SWMU 2) building. No waste is currently managed in this unit. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

RELEASED
DATE 12/21/01
RIN #
INITIALS

ENFORCEMENT CONFIDENTIAL

AOC 1 **Oil Contamination Area**

Conclusions: This area consists of a blacktopped area on the southeast side of the facility. On October 3, 1991, during the construction of a storm sewer line, an oil sheen appeared on some water present in the ditch constructed for the storm sewer line. The oil and water mixture was inadvertently pumped out of the ditch into a storm sewer line leading to the BWR Unit 1 intake canal. The possible source of this oil contamination is a former fuel island, however, the facility has not conducted an investigation to determine the source and extent of contamination in this area. The potential for release to groundwater is moderate because a release to on-site soils has been documented for AOC 1. The potential for a release to surface water and air is low.

Recommendations: PRC recommends that the facility conduct soil sampling activities to determine the extent of contamination in this area.

AOC 2 **Diesel Fuel Spill Area No. 1**

Conclusions: This area consists of soil and gravel within the bermed area of a diesel fuel storage tank located on the north side of the facility. On December 11, 1992, No. 2 diesel fuel spilled to snow covered soil and gravel within the bermed area of a diesel fuel storage tank. The spilled diesel fuel and contaminated soils were removed from the area. The facility has not conducted an investigation to determine the source and extent of contamination in this area. The potential for release to groundwater is moderate because a release to on-site soils has been documented for AOC 2. The potential for release to surface water and air is low.

Recommendations: PRC recommends that the facility conduct soil sampling activities to determine the extent of contamination in this area.

RELEASED 1/22/01
DATE
RIN #
INITIALS

ENFORCEMENT CONFIDENTIAL

AOC 3 **Diesel Fuel Spill Area No. 2**

Conclusions: This area consists of soil and gravel located on the southwest side of the facility. On November 26, 1993, a diesel oil fuel storage tank leaked about 760 gallons of diesel fuel to soil and gravel. The facility has not conducted an investigation to determine the source and extent of contamination in this area. The potential for release to groundwater is moderate because a release to on-site soils has been documented for AOC 3. The potential for a release to surface water and air is low.

Recommendations: PRC recommends that the facility conduct soil sampling activities to determine the extent of contamination in this area.

RELEASED
DATE 11/22/01
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Mixed Waste CSA	May 1993 to present	None	No further action
2. Hazardous and Nonhazardous Waste CSA	February 7, 1991, to present	None	No further action
3. Satellite Accumulation Areas (SAAs)	Mid-1980s to present	None	No further action
4. Oil and Water Separators	1960 to present	None	No further action
5. Non-Radioactive WWTP	December 31, 1978, to present	None	No further action
6. Outdoor Sludge Drying Beds	December 31, 1978 to present	None	No further action
7. Former Mixed Waste Storage Area	November 1, 1990, to May 1993	None	No further action
8. Former Hazardous and Nonhazardous Waste CSA	1985 to February 7, 1991	None	No further action

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1. Oil Contamination Area	October 3, 1991 to present	Oil contamination discovered during construction of a storm sewer line	PRC recommends that the facility conduct soil sampling activities to determine the extent of contamination in this area

RELEASED
DATE 1/22/01
RIN #
INITIALS

ENFORCEMENT
CONFIDENTIAL

ENFORCEMENT
CONFIDENTIAL

TABLE 3

SWMU AND AOC SUMMARY (CONTINUED)

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
2. Diesel Fuel Spill Area No. 1	December 11, 1992, to present	Diesel fuel spill to soil and gravel	PRC recommends that the facility conduct soil sampling activities to determine the extent of contamination in this area
3. Diesel Fuel Spill Area No. 2	November 26, 1993, to present	Diesel fuel spill to soil and gravel	PRC recommends that the facility conduct soil sampling activities to determine the extent of contamination in this area

RELEASED
DATE 1/22/01
BY #
INITIALS

ENFORCEMENT
CONFIDENTIAL

REFERENCES

Commonwealth Edison. 1980a. Notification of Hazardous Waste Activity. August 14.

Commonwealth Edison. 1980b. Letter Regarding Sewage Treatment Surge Tank Overflow. From D. J. Scott, Station Superintendent. To the U.S. Environmental Protection Agency (EPA) and the Illinois Environmental Protection Agency (IEPA). November 20.

Commonwealth Edison. 1981a. Letter Regarding Sewage Treatment Surge Tank Overflow. From D. J. Scott, Station Superintendent. To EPA and IEPA. January 8.

Commonwealth Edison. 1981b. Letter Regarding Sewage Treatment Surge Tank Overflow. From D. J. Scott, Station Superintendent. To EPA and IEPA. March 12.

Commonwealth Edison. 1981c. Letter Regarding Sewage Treatment Surge Tank Overflow. From D. J. Scott, Station Superintendent. To EPA and IEPA. March 17.

Commonwealth Edison. 1982. Letter Regarding Improper Notification of Treatment, Storage, and Disposal (TSD) Activities. October 4.

Commonwealth Edison. 1986a. Letter Regarding IEPA Air Pollution Control Violations. From C. L. McDonough, Director of Air Quality. To Martin Tippin, IEPA. June 27.

Commonwealth Edison. 1986b. Letter Regarding National Pollutant Discharge Elimination System (NPDES) Permit Compliance. From E. D. Eeigenburg, Dresden Station Manager. To IEPA. November 18.

Commonwealth Edison. 1987. Letter Regarding Sulfuric Acid Spill. From Thomas E. Hemminger, Director of Water Quality. To Charles W. Brutlag, Office of Emergency Management, IEPA. October 13.

Commonwealth Edison. 1988. NPDES Permit Application. August 30.

Commonwealth Edison. 1990a. Part A Permit Application. October 26.

Commonwealth Edison. 1990b. Letter Regarding Part A Permit Application. From Thomas E. Hemminger, Environmental Services Manager. To George Hamper, EPA. October 31.

Commonwealth Edison. 1991a. Letter Regarding Sodium Hypochlorite Spill. From Brian M. McCann, Supervisor of Land Quality. To Dean Schlee, IEPA. March 21.

Commonwealth Edison. 1991b. Letter Regarding Sodium Hypochlorite Spill. From Brian M. McCann, Supervisor of Land Quality. James Lutz, Emergency Planning Committee, Grundy County. March 22.

Commonwealth Edison. 1991c. Letter Regarding Mineral Oil Spill. From Brian McCann, Supervisor of Land Quality. To David Hertzing, IEPA, Office of Chemical Safety. December 11.

Commonwealth Edison. 1991d. Letter Regarding Spill Incident Number 912817. From Brian McCann, Supervisor of Land Quality. To David Hertzing, IEPA, Office of Chemical Safety. December 24.

Commonwealth Edison. 1992a. Letter Regarding NPDES Noncompliance. From Charles Schroeder, Station Manager. To Compliance Unit Chief, IEPA and EPA. February 21.

Commonwealth Edison. 1992b. Revised Part A Permit Application. July 1.

Commonwealth Edison. 1993a. Letter Regarding Release of No. 2 Diesel Fuel. From Brian McCann, Supervisor of Land Quality. To Charles Brutlag, Incident Coordinator, Office of Chemical Safety, Commonwealth Edison. February 5.

Commonwealth Edison. 1993b. Letter Regarding Resource Conservation and Recovery Act (RCRA) Part A Permit Revision. From Brian McCann, Supervisor of Land Quality. To Lawrence Eastep, P.E., Manager, Permit Section. April 23.

Commonwealth Edison. 1994. Information Provided for EPA Preliminary Assessment and Visual Site Inspection. February 6.

Illinois Environmental Protection Agency (IEPA). 1985a. Letter Regarding NPDES Permit Compliance. From Kenneth Rogers, Division of Water Pollution Control. To John M. Hughes, Commonwealth Edison. January 2.

IEPA. 1985b. Letter Regarding Mobile Volume Reduction Unit. From Bharat Mathur, Division of Air Pollution Control. To Dresden Station Representative, Commonwealth Edison. May 6.

IEPA. 1986. Memorandum Regarding Air Emissions Sources. From Martin P. Tippin. To Sy Levine. May 23.

IEPA. 1988. Letter Regarding Mobile Volume Reduction Unit. From Terry A. Switzer, Division of Air Pollution Control. To Commonwealth Edison. December 23.

IEPA. 1990. Letter Regarding Revised RCRA Part A Permit. From Lawrence Eastep, P.E., Manager, Permit Section. To Thomas Hemminger, Commonwealth Edison. December 19.

IEPA. 1991. NPDES Permit. August 26.

IEPA. 1992a. Letter Regarding Releases from Electrical Equipment. From Charles Brutlag, Incident Coordinator, Emergency Response Unit. To Diane Richardson, Commonwealth Edison. January 6.

IEPA. 1992b. Letter Regarding Withdrawal of the Facility's Operating Permit for the Standby Emergency Auxiliary Boiler. From Donald Sutton, P.E., Manager, Division of Air Pollution

Control. To Mary O'Toole, Superintendent of Air Quality, Commonwealth Edison. April 20.

IEPA. 1993a. Letter Regarding Revised RCRA Part A Permit. From Lawrence Eastep, P.E., Manager, Permit Section. May 18.

IEPA. 1993b. Memorandum Regarding Compliance Inspection. From William Zenisek. To Sy Levine. May 26.

Illinois State Geological Survey (ISGS). 1922. *Geology and Mineral Resources of the Morris Quadrangle.* Prepared by Harold E. Culver. Bulletin 43.

ISGS. 1955. *Groundwater Possibilities in Northeastern Illinois.* Prepared by Bergstrom and others. Circular 198.

PRC Environmental Management, Inc. (PRC). 1994a. Record of Telephone Conversation. Between Robert Geiger and Don Rink, Commonwealth Edison. February 15 and 16.

PRC. 1994b. Record of Telephone Conversation. Between Robert Geiger and Grayce Madjewski and Bob Hocman, Commonwealth Edison. March 7.

U.S. Department of Agriculture (USDA). 1980. *Soil Survey of Grundy County, Illinois.* Soil Conservation Service in Cooperation with the Illinois Agricultural Experiment Station. May.

U.S. Department of Commerce (USDOC). 1963. *Rainfall Frequency Atlas of the United States.* Technical Paper No. 40.

USDOC. 1968. *Climatic Atlas of the United States.* U.S. Government Printing Office. Washington, D.C.

U.S. Department of the Interior (DOI). 1983. National Wetlands Inventory Maps for the Minooka and Coal City, Illinois, Quadrangles. April.

U.S. Environmental Protection Agency (EPA). 1982. Letter Regarding Part A Permit Application. From Karl J. Klepitsch, Jr., Chief, Waste Management Branch. To Commonwealth Edison. September 28.

U.S. Geological Survey (USGS). 1973. 7.5-Minute Series Topographic Map of Channahon, Illinois, Quadrangle.

USGS. 1973. 7.5-Minute Series Topographic Map of Coal City, Illinois, Quadrangle.

USGS. 1973. 7.5-Minute Series Topographic Map of Wilmington, Illinois, Quadrangle.

USGS. 1980. 7.5-Minute Series Topographic Map of Minooka, Illinois, Quadrangle.

USGS. 1986. "Observation Well Network in Illinois in 1984." Prepared by David C. Voelker. Open-File Report 86-416 (W).

APPENDIX A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

(15 Pages)

VISUAL SITE INSPECTION SUMMARY

Commonwealth Edison, Dresden Nuclear Power Station
Lorenzo Road
Morris, Illinois 60450
ILD 000 665 489

Date:	January 6, 1994
Primary Facility Representative:	Grayce Madjewski, Commonwealth Edison
Representative Telephone No.:	(312) 394-4453
Additional Facility Representatives:	El Carroll, Commonwealth Edison Don Fink, Commonwealth Edison Bob Hocman, Commonwealth Edison Michael Muth, Commonwealth Edison Richard Ralph, Commonwealth Edison Julia Wozniak, Commonwealth Edison
Inspection Team:	Sandy Anagnostopoulos, PRC Environmental Management, Inc. (PRC) Robert Geiger, PRC
Photographer:	Robert Geiger, PRC
Weather Conditions:	Cloudy and snowing, 20 °F
Summary of Activities:	The visual site inspection (VSI) began at 10:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 1:00 p.m. The inspection included the following areas where the SWMUs are located: the Mixed Waste Container Storage Area (CSA) (SWMU 1), the Hazardous and Nonhazardous Waste CSA (SWMU 2), the Satellite Accumulation Areas (SAA) (SWMU 3), the Oil and Water Separators (SWMU 4), the Non-Radioactive Wastewater Treatment Plant (WWTP) (SWMU 5), the Outdoor Sludge Drying Beds (SWMU 6), the Former Mixed Waste Storage Area (SWMU 7), and the Former Hazardous and Nonhazardous Waste CSA (SWMU 8).

The tour concluded at 3:30 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:00 p.m.

PRC conducted a follow-up VSI on February 24, 1994. The inspection included the following areas where one SWMU and three AOCs are located: the Former Mixed Waste Storage Area (SWMU 7), the Oil Contamination Area (AOC 1), the Diesel Fuel Oil Spill Area No. 1 (AOC 2), and the Diesel Oil Spill Area No. 2 (AOC 3).

Photograph No. 1 Location: SWMU 1
Orientation: West Date: January 6, 1994
Description: Mixed waste and potential mixed waste stored in 55-gallon drums in the Mixed Waste CSA (SWMU 1) storage building

Photograph No. 2 Location: SWMU 1
Orientation: West Date: January 6, 1994
Description: Mixed waste and potential mixed waste stored in 55-gallon drums in the Mixed Waste CSA (SWMU 1) storage building

Photograph No. 3 Location: SWMU 1
Orientation: Northwest Date: January 6, 1994
Description: Mixed waste managed in 55-gallon drums in the Mixed Waste CSA (SWMU 1) storage building

Photograph No. 4 Location: SWMU 1
Orientation: North Date: January 6, 1994
Description: Mixed waste stored in 55-gallons in the Mixed Waste CSA (SWMU 1) storage building

Photograph No. 5 Location: SWMU 4
Orientation: North Date: January 6, 1994
Description: Surface above an oil and water separator unit on the east side of the Mixed Waste CSA (SWMU 1) storage building

Photograph No. 6 Location: SWMU 3 located within SWMU 5
Orientation: South Date: January 6, 1994
Description: A SAA managing waste oils in a 55-gallon drum within the Non-Radioactive WWTP (SWMU 5) storage building

Photograph No. 7 Location: SWMU 5
Orientation: East Date: January 6, 1994
Description: View of flocculator clarifiers in the Non-Radioactive WWTP (SWMU 5)

Photograph No. 8 Location: SWMU 5
Orientation: West Date: January 6, 1994
Description: Sand filters in the Non-Radioactive WWTP (SWMU 5)

Photograph No. 9 Location: SWMU 3
Orientation: East Date: January 6, 1994
Description: A SAA located within the facility's main building that contains the BWR units

Photograph No. 10 Location: SWMU 3
Orientation: North Date: January 6, 1994
Description: A SAA located within the facility's main building that contains the BWR units

Photograph No. 11 Location: SWMU 3
Orientation: North Date: January 6, 1994
Description: A SAA located in a facility building located on the northeast side of the facility

Photograph No. 12 Location: SWMU 2
Orientation: South Date: January 6, 1994
Description: Some of the 55-gallon drums located within the Hazardous and Nonhazardous Waste CSA (SWMU 2)

Photograph No. 13 Location: SWMU 2
Orientation: East Date: January 6, 1994
Description: A 5-gallon container in the lab pack waste storage area within the Hazardous and Nonhazardous Waste CSA (SWMU 2)

Photograph No. 14 Location: SWMU 2
Orientation: East Date: January 6, 1994
Description: Lab pack waste storage area within the Hazardous and Nonhazardous Waste CSA (SWMU 2)

Photograph No. 15 Location: SWMU 2
Orientation: South Date: January 6, 1994
Description: Some of the 55-gallon drums containing nonhazardous waste in the Hazardous and Nonhazardous Waste CSA (SWMU 2)

Photograph No. 16 Location: SWMU 2
Orientation: South Date: January 6, 1994
Description: Some of the 55-gallon drums stored in the Hazardous and Nonhazardous Waste CSA

Photograph No. 17 Location: SWMU 2
Orientation: North Date: January 6, 1994
Description: Some of the 55-gallon drums in the Hazardous and Nonhazardous Waste CSA

Photograph No. 18 Location: SWMU 8
Orientation: Southwest Date: January 6, 1994
Description: Snow-covered blacktopped area that is the location of the Former Hazardous and Nonhazardous Waste CSA

UNDEVELOPED

Photograph No. 19 Location: SWMU 6
Orientation: East Date: February 24, 1994
Description: This photograph was intended to show the Outdoor Sludge Drying Beds (SWMU 6).

Photograph No. 20 Location: AOC 2
Orientation: West Date: February 24, 1994
Description: Diesel Fuel Spill Area No. 1 (AOC 2) located on the north side of the facility

Photograph No. 21 Location: SWMU 7
Orientation: West Date: February 24, 1994
Description: Inside a trailer in the Former Mixed Waste Storage Area (SWMU 7) located on the north side of the facility

Photograph No. 22 Location: SWMU 7
Orientation: North Date: February 24, 1994
Description: Former Mixed Waste Storage Area (SWMU 7) located on the north side of the facility

Photograph No. 23 Location: AOC 3
Orientation: West Date: February 24, 1994
Description: Diesel Fuel Spill Area No. 2 (AOC 3) located on the southwest side of the facility

Photograph No. 24 Location: AOC 1
Orientation: East Date: February 24, 1994
Description: Oil Contamination Area (AOC 1) located on the southeast side of the facility

APPENDIX B

VISUAL SITE INSPECTION FIELD NOTES

(22 Sheets)

Commonwealth Edison –
Dresden Nuclear Power
Station

January 6, 1994
ILD 000 665 489

(126)

(121

Commonwealth Edison –
Dresden Nuclear Power
Station

January 6, 1994
ILD 000 665 489

(128)

10:00 AM

Conditions:

Snowy; High 20's
Cloudy

Present at Opening Meeting:

El Carroll Comm Ed
Chemistry Supervisor

Bob Hocman Comm Ed
Systems Engineering
EPA Comp. Eng

Julia Woznik Comm Ed
ENV. Services Dept.
NPDES Compliance

Michael Muth Comm Ed
System Engineer

Richard Ralph Comm Ed
Systems Engineering
Team Leader

Don Rinke Comm Ed Waste
Products
Chemist

(127)

Grayce Majewski Comm Ed
Environmental
Services
Dept.

Comm Ed prepared PA/VSI
information document:

PRC looked through document
to get idea of what info.
still needed to be obtained

Mixed Waste Storage Area
50' x 64'

Facility was farmland
before unit 1 began in
1959.

Adjacent land leased to farmers

East: Kankakee

(130)

N: Des Plaines / Illinois

W: Corp of Engineers, Commercial land leased to farmers

S: GE Fuel Recovery Plant some Residential housing

RSB

Pressurized Water Reactor

RSB

Feed water from wells

Cooling water from river

Water Intake ≈ 800,000 gal/min

Kankakee

Water Out — Illinois

Water from river just for condensers — non contact

Water Wells

400 two deep

550 well pumps

How much? Will look into and provide info.

(131)

Wells used mostly for purposes other than feed water.

Wells provide DW; looking in parking lot

Sampled? — for standard contaminants not regularly for radionuclides for normal parameters

Well Water sampled 1/month

Storage

Miscellaneous well water (DW) sampled

Chloroform sampling 1/wk.

(132)

916 employees
3 shifts
7 days

WWTP: process non-radioactive
floor drains (including roof drain)
filter backwash
(storm) surface water runoff:
through oil seperator,
back to canal — discharge canal

① Rad Waste treatment plant
Rad Waste System: laundry waste,

② WWTP: late 1970's - 1978 filter waste
(non Rad)
NPDES regulated

③ Sanitary (Sewage) Treatment Plant
Sludge dried, packaged

(133)

Sewage TP
and sent off as rad-waste
how often? - ?
Chem Nuclear
Burial facility in
Barnwell, SC

Rad TP
also to burial facility
in Barnwell, SC
Chem Nuclear

Floor drains w/in plant to
Rad Waste treatment
system

Sludge from WWTP

Landfills? No
past?
present?

USTs? in document provided
product tanks? Additional
or Information
waste? Provided

Dry Active Waste (Rad)
contaminated garbage
to Chem Nuclear, buried
in Barnwell, SC

Mobile Volume Reduction
Unit: [redacted] was
permitted, but never operated
intended for Rad waste
to reduce dry active waste
volume

Spent Solvent - drummed
SET Environmental:
Treatment One

Sodium hydroxide: from
water treatment. from tank
that was decommissioned
from demineralization

Sulfuric Acid: from
demineralization where
tank cleaned for
decommiss.

Ethyl Glycol / Water
Diesel generators
Vehicle maintenance
chillers

136

Chlorinated Solvents / Oil
Plant maintenance

Solvent - based paint:
excess paint

Epoxy Resin:
from durable floor coating
entire floor covered

Sulfuric acid with solids
from same tank that was
decommissioned

Lab Pack: expired lab
chemicals

Sanuril 115: chlorine
tablets from sewage
treatment system.

Tablets got wet - became chunks

137

(Diesel Fuel / Gas:
fire training - one time
excess not used in
burning - fire training
conducted frequently
≈ 6 times / year

CWE 15 Power Line Deposit
Control

Silk dispersant: from
water treatment

Acid Caustic Pipe Rinse Water
demineralization

Paint Solvent:
excess from cleaning

Freon Solvent: residual from freon cleaner. Dry cleaning for cleaning clothing — now wet wash that goes to Rad waste TS.
How long dry cleaned?
5-6 yrs in 80's.
- in mixed waste storage area

Oil Solvent Sludge - plant equip. Maintenance - from general operations

Freon Filter: non rad — not considered mixed waste

Fly ash: from boilers. 2-3 yrs ago stack cleaned, removed (1st fly ash from cleaning

Treatment One transported off-site

20 Solvent Oil — general maint

21 Paint Solvent — " "

Oil Solvent — " "

Oil/Sludge — " "

Solvent Dipping, wiping,

Solvent (Degreasing)

Solvent/Oil — general maint.

WW TP: John
(2) units (1) CLOW aerobic digestion
(1) Trickling filter system

(140)

Sewage

100 drums this yr. because of

Oil Seperators

5-6 drums/yr average

Currently cleaning all oil seperators

5 seperators total

15,000 gall/day through non-rad

2 seperators for the systems weir and baffle system with skimmers

Cribhouse, 2 seperators

Non Rad WWTP

Equilizer Tank - 100,000 gall cap.

33,000 gallon tank (concrete)

for pH levels

eliminates shock loads

stays in for 8-9 hours (detention)

(141)

to 2 Flocculator

Clarifiers - splitter box adding alum at this pt.

agitator in flocculator

clarifier is outside section carbon steel - above ground

to another splitter box.

to sand filters

50,000 gall each steel tanks

per day

capacity: 4 ft dia by 15 ft high

to clear well: 10,000 gal concrete tank: supply to backwash water (once/day)

to effluent, sampled, discharge

(7 backwashes per 10,000 gal

effluent bay - through cooling lake

underground piping near hot canal - condensed to bay

Cool canal - lake to river or plant

Stwn plant & seperators : underground piping steel

seperator to belt skimmer, equil. underground piping (steel)

all piping inside is aboveground and steel

clarifier to sand - aboveground, steel

sand to clearwell aboveground

clearwell to effluent trough concrete spillway

Operation since : Dec 31, 1978

Before : Oil/Seperator Pits to hot canal

Mixed Waste Area :

11/1990 : trailors

1992 : building

trailors: (4) on concrete pad

(3) have contained waste

capacity :

67 drums : 55, 42 gallon drums

2,865 gallons in 67 containers

(144)

trailors now empty
March 1993 waste switched
to building
December 17-18, 1993
waste consolidated

Copies of info on trailor,
building will be provided

80 drums (containers) 55 gallon
3,950 gallons total
current in mixed waste storage
area

< 90 day storage area
Don Rink providing info.

(145)

Sewage Treatment System

Pure stream surge tank - diverts b/w
(2) Systems: both running constantly

primary clarifier

sludge skimming → to digester

sludge in digester back to surge tanks or to drying beds

Dried, packed as low-level rad waste

clean water to trickling filter (synthetic media) to secondary settling tank

skimmer pump
sludge pump

to Chlorine contact tank

to Kankakee

Surge Tank Over flows
CLOW system operating
Pure Stream not operating at that time
CLOW:
pure stream surge tank
to primary clarifier
(aerobic system)
sludge directly to drying beds
water to clarifier tank
(baffles in clarifier)
clean water to sand filter
to chlorine contact tank

Sanitary Sludge Off-site
800 yd^3 ft /year

Pure Stream	48,000 gpd	1992
CLOW	18,000 gpd	1979-80

Spirohoff System
8,000 gpd
1969

Imhoff System 1959-1954
Since 1969, waste has been
going off as rad-waste

< 90 day Storage Area
11/90 construction
2/7/91 operating
50' x 64' concrete bermed
identical to mixed waste
building except has garage
door

prior to 2/7/91 black topped storage area: outside 90 day storage
back to: 1985
20' x 30'
drums on blacktoppe.

(147

SAAs (cont'd)

1 rad, mixed, low-level – in plant SAA (1 drum) (Lube Room

2 Warehouse (1 drum)

3 [redacted] in 90 day storage area (1 drum)

~~[redacted]~~ PCB

~~[redacted]~~ PCB

Warehouse SAA: mid 1980's

90 day SAA: early 1980's

4 ✓ Mechanical Maint. — mid 1980's

5 Waste Oil and Solvent Waste (1 drum each) → Vehicles, equip.

[redacted] Antifreeze collected seperately

6 ✓ Substation Construction Shop Maintenance mid 1980's

1 drum - oil

(148

SAAs:

- non haz oils pumped by tanker. in

non haz oil recycled

~~solvents~~ and solvent/oil combinations are fuel blended.

See Annual Report for more detailed information

PCB Oils: Transformers drained, replaced. Company wide program. All outside ~~transformers~~ replaced in early 1980s.

PCB oil off-site recently?

No.

(150)

All indoors on concrete

7 345 Switchyard mid/1980's
Warehouse
2 drums 1 - solvent
1 - oil
indoors, concrete

Facility tour begins ≈ 1:00 p.m.
[redacted] RSC

Areas to Tour:
- <90 day Accumulation Area
- Former Accumulation Area
- SAAs
- Oil Seperators ✓
- Oil Seperator Pits ✓
- WWTP ✓
- Sewage Treatment
- Mixed waste ✓
- Fire Training Pit

Photographs (121)

No.	Facing		Description
			Mixed Waste Storage Area
1	W	105	Oil Water Seperator Pit Cleanout Drums
	(1) neg hangar		
2	W	≈80	Mixed waste on Containment Pallets
	2 PCB waste drums		
3	NW		potential oily ash, (4) 55 gal (3) 55 gal overpack
4	N		Extra overpacks (4) 55 gal
	(2) PCB Waste Drums: from 1950's.		
5	N		Oil water Seperator

(152)

6 S SAA - oil accumulation from skimmer

Solar Environmental Reagents

Need info regarding fregreency of disposal

3/year to mixed waste for testing, to 90 day area

7 E WWTP

(2) Flocculator clarifiers

(1) Skum tank

8 W WWTP

(2) Sand Filters

9 E ① Used Oil, ① waste oil, ① Used EHC oil

① contaminated solvents

① contaminated oil

(6) drums ① Diesel Fuel

floor drain

10 N 2 drums

Waste solvent

Waste oil

1/yr

N N SAA Substation

(1) drums

Wrapup meeting conducted. (prior to touring the areas located outside the plant

12 S SAA 5 drums

1 Waste oil

2 Waste solvent

3 Waste ethyl Glycol

4 Waste EHC oil

5 Waste aerosol

13 E 5 gal Mercury container

(13.5)

(154)

14 E Waste Collection Area
Lab Pack Waste
(same 5 gal - mercury)

15 S Non Haz drums
SCT transports offsite
28 - 55 gallon drums

16 S No. 6 diesel fuel
9 drums
discontinued use of No. 6 fuel
2 from maintenance shop - contains
(1) waste solvents
(1) spent EHC oil

SAA - Review

(155

SAAs

1 Substation - oil
2 Mechanical Maint.
3 Lube Room
4 Warehouse (Product storage room)
5 90 day SA
5 gal - mercury
55 gal - solvent
6 345 Switchyard

- Analyze for isotopic radioactivity in mixed waste
- If clean, to 90 day storage
If not, further analyze or stored as mixed waste

(156) photos (cont'd)

17 N Waste oil
15 drums

Photos 12 ~ 17 In
< 90 day storage area

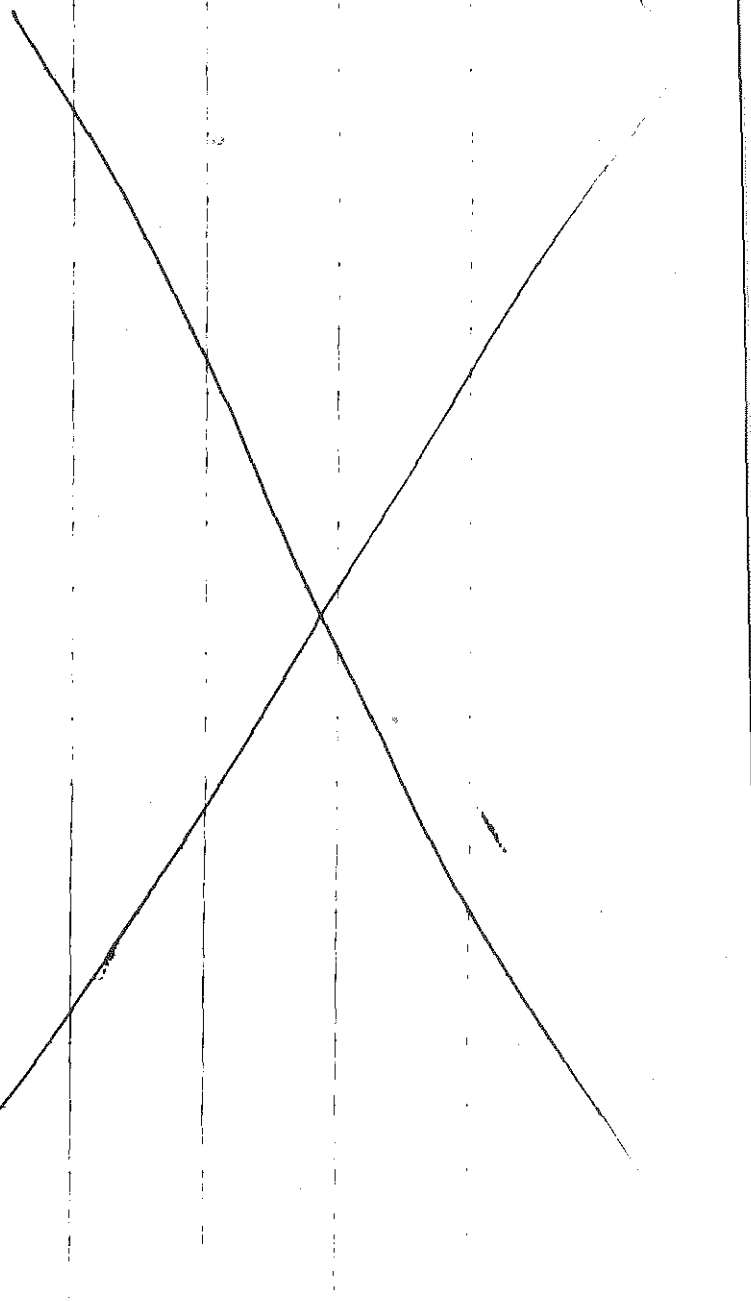
18 SW Black topped area
Former SAA
for drums

19 N Fire Training
Area
6 inch bermed
concrete area

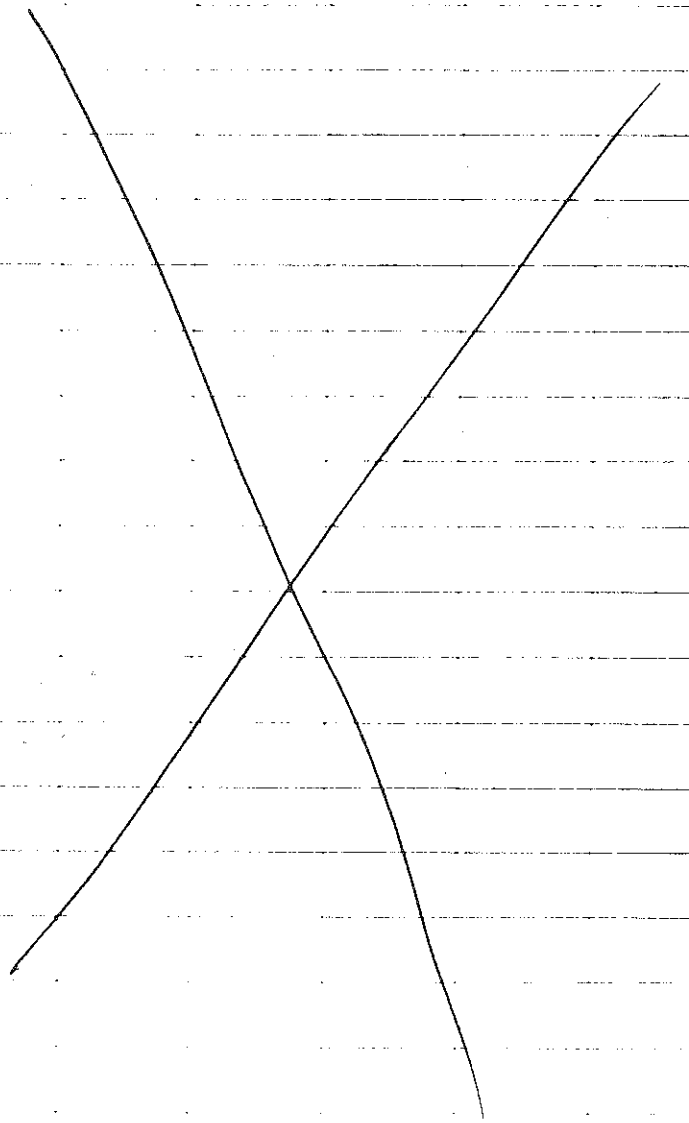
Diesel gas mixture

PRC left facility at
4:45 pm.

R Jaeger
01/06/94



10



11

Commonwealth Edison

Dresden Station

02/24/94

ILD 000 665 489

Morris, IL

Facility Re-visit

12 sunny, low 20's

Robert Geiger, Sandy A. — PRC

9:30 AM met D. Rink at entrance gate

PRC began to discuss and confirm information & necessary for completion of the PA/VSI

Waste solvents 100 - 500 gal/yr. this is typical

SET to Treatment One Petrochem fuels blending

Waste oils 100 - 500 gal/yr typical

SET to Treatment One Petrochem.

Heritage Oil, Solar, 5-K to Breslube handle non haz oils. Seperate from SET

Chlorinated waste solvent and waste oil mixture ≈ 1,000 - 4200 gal/yr

paints cleaning, equipment maintenance, surface prep for painting, vehicle maintenance

Waste paint 100 - 300 gal/yr OK

Lab pack waste off spec, outdated material 200 - 300 gal/yr - more accurate tested for radioactivity

Waste ethyl glycol

1,000 gal/yr – OK

from diesels generator maintenance

coolant system related

Oil and Grease

Sumps w/in plant

collect oil and grease

300 – 400 gal/yr OK

SET to Petrochem

WWTP Sludge

boxed, talk to Bob Hackman

or

Julia W.

Miscellaneous Nonhaz

2,000 – 3,000 gal.

more accurate

Garbage truck 30 gallons

soils removed, cleaned

spill to gravel

Photograph No. 20

Looking east : 30 gallon garbage truck ground is and always has been gravel

spill area now trailers.

10/03/91 oil-contamination discovery

storm sewer construction and oil sheen discovered in ditch oil pumped. Talk to Grace Madjewski. Soil removed and shipped to landfill. Talk to Dave Rupner in environmental section.

SET to Land; Uhler

16

12/11/92 Spill of diesel fuel.
free standing oil removed
soils removed; snow, oil, water
mixture removed.. Spill was to
soil. On north side near fuel
oil storage tank. Dan not
aware of sampling activities,
ask Grace. Spill occurred
within bermed area around diesel
fuel

02/22/93 Minmal Oil spill.
Spilled to a gravel area

11/26/93 diesel oil spill to
gravel, contained in barrells
trace amounts of radioactive
Sampling of soil? Ask Grace
May just have been visual inspection

Containerized and handled as
radioactive waste

17

08/06/90 transformer spilled
20 gallons. No PCBs. Soils
removed. Beyond fenced area,
but on Comm Ed property. located
on the
Western side, outside of the facility
fencing. (In 345 Switchyard)

(3) ejector pits, (2)
oil/water seperators

Before Mixed Waste CSA,
radioactivity tested in SWAs

Mobile incinerator unit: purpose
was to reduce radioactive air
emissions.

Sludge drying beds - no former
beds. Current beds are outdoors

Have not had to remove any sludge
WWTP overdesigned. Would be treated as radioactive waste.
Water boiled to steam. Steam to turbine
Steam to condenser; steam that doesn't is cooled, heated, recombined as go to condenser
part of the off-gas system.
steam is cooled off within the condenser in reactor building

Condenser uses river water from intake structure. To discharge canal to cooling lake to intake canal

Well water through demineralization system; for various plant use, including DW.

Residences to S. — on wells

Photograph No. 21
Sludge drying beds (5); (1) is covered. Also used as a storage area for radioactive waste beds contain gravel, dirt, weeds — no sludge —. will be handled as rad waste
photo looking east

Photograph No. 22
looking South — Mineral Oil Spill Area — gravel surface

Photograph No. 23
Fuel oil spill in berm of fuel oil storage tank. Clay gravel surface - looking west.

Photo No. 24 in NE trailer in Former Mixed Waste ~~Trailer~~ Storage Area (looking West)

18" of concrete; 4 trailers
capacity of ~32 55-gallon drums
each. – equipped w/ sumps

SW trailer has only been
used for storage of emergency
response equipment

No drains

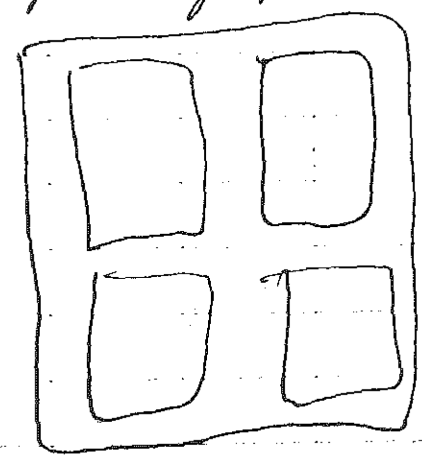


Photo 25: looking North at
Former MW ~~Ɇ~~SA (SWMU 7)

Photograph No. 26

Oil spill to gravel 11/26/93

photo looking W
spill that tested positive for
radioactivity

Photograph No. 27 (looking E)
oil contamination ~~s~~sheen
affected area

PRC leaves facility at 1:30p

RS Geiger

02/24/94

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
WMD RECORD CENTER
OCT 26 1995

REPLY TO THE ATTENTION OF:

HRE-8J

December 8, 1993

Mr. Gary Spedl
Plant Manager
Commonwealth Edison
Dresden Station
6500 N. Dresden Road
Morris, IL 60450

Re: Visual Site Inspection
Commonwealth Edison
Dresden Station
Morris, IL
ILD 000 665 489

Dear Mr. Spedl:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Printed on Recycled Paper

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for January 6, 1994, at 9:00 am. The inspection team will consist of Robert Geiger and another employee of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francene M. Harris for

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Larry Eastep, IEPA - Springfield
Warren Weritz, IEPA - Maywood
Grace Madjewski, Commonwealth Edison
Don Rink, Commonwealth Edison